



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL  
HURON COUNTY**

**CERTIFIED MAIL**

Street Address:

50 West Town Street, Suite 700

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 03-13652**

**Fac ID: 0339010151**

**DATE: 4/3/2007**

Autoplas  
Terry Cummings  
PO Box 348 560 Goodrich Road  
Bellevue, OH 44811

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

Sincerely,

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

CC: USEPA

NWDO



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install**

**Issue Date: 4/3/2007**

**FINAL PERMIT TO INSTALL 03-13652**

Application Number: 03-13652  
Facility ID: 0339010151  
Permit Fee: **\$2800**  
Name of Facility: Autoplas  
Person to Contact: Terry Cummings  
Address: PO Box 348 560 Goodrich Road  
Bellevue, OH 44811

Location of proposed air contaminant source(s) [emissions unit(s)]:

**560 Goodrich Road  
Bellevue, Ohio**

Description of proposed emissions unit(s):

**Modification to paint line No. 7 through the installation of an additional booth.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



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Chris Korleski  
Director

**Autoplas**  
**PTI Application: 03-13652**  
**Issued: 4/3/2007**

**Facility ID: 0339010151**

## **Part I - GENERAL TERMS AND CONDITIONS**

### **A. Permit to Install General Terms and Conditions**

#### **1. Compliance Requirements**

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

#### **2. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

#### **3. Records Retention Requirements**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

#### **4. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon

**Autoplas**  
**PTI Application: 03-13652**  
**Issued: 4/3/2007**

**Facility ID: 0339010151**

the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**6. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**7. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**9. Construction of New Sources(s)**

**Autoplas**  
**PTI Application: 03-13652**  
**Issued: 4/3/2007**

**Facility ID: 0339010151**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

#### **10. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

#### **11. Applicability**

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

#### **12. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

Autoplas  
 PTI Application: 03-13652  
 Issued: 4/3/2007

Facility ID: 0339010151

**13. Source Operation and Operating Permit Requirements After Completion of Construction**

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

**14. Construction Compliance Certification**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**15. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

**B. Permit to Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)  
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	90.0
Single HAP	9.9
Total HAP	24.9

Autoplas  
PTI Application: 03 12652  
Issue

Facility ID: 0339010151

Emissions Unit ID: R001

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
R001 - Paint Spray Booth #1 in Paint Line #1 (modification to PTI #03-7011 issued on 2-24-93 and PTI #03-8830 issued on 8-30-95 and modified on 8-27-97). Modification is to revise emission limitations.	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-07(G)(2) OAC rule 3745-17-07(A) OAC rule 3745-17-11(B)
	OAC rule 3745-31-05(C)	

Applicable Emissions  
Limitations/Control Measures

See A.2.e

1.32 lbs organic compounds (OC)/hr, 5.78 tons OC/yr from coating operation

1,107 lbs non-volatile organic compounds (NVOC)/month, 6.64 tons NVOC/yr from cleanup operations for R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined (see B.1., B.2., and B.3.)

See A.2.a

90.0 tons OC per rolling, 365-day period from all the emission units identified in A.2.b

9.9 tons of any single hazardous air pollutant (HAP) emission per rolling, 12-month period from all the emission units identified in A.2.b

24.9 tons of total combined HAP emissions per rolling, 12-month period from all the emission units identified in A.2.b

See B.1

See A.2.d

## 2. Additional Terms and Conditions

- 2.a** The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
- 2.b** This permit establishes the following federally enforceable emission limitations for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
- i. 90.00 tons OC per rolling, 12-month period
  - ii. 9.9 tons of any single HAP per rolling, 12-month period
  - iii. 24.9 tons of total combined HAP emissions per rolling, 12-month period

The federally enforceable emission limitations are being established for purposes of avoiding Title V and Maximum Achievable Control Technology (MACT) requirements. For purposes of federal enforceability an restriction on OC effectively restricts volatile organic compounds.

Rolling OC limitations for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 were established in Permit to Install (PTI) #03-PTI #03-8830 issued on 8-30-95 and modified on 8-27-97, and as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable OC restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability, OC limitations effectively restrict VOC emissions.

To ensure federal enforceability of single HAP and total HAP emission restrictions during the first 12 months of operation, under the provisions of this permit, for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined, the permittee shall not exceed the cumulative monthly emissions specified in the following table:

Month	Any single HAP emission, in tons	Total HAP emissions, in tons
1	1.65	4.15
1-2	3.30	9.30
1-3	4.95	12.45
1-4	6.60	16.60
1-5	8.25	20.75

1-12	9.90	24.90
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- 2.c** The hourly and annual emission limitations from coating operations represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitations.
- 2.d** This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.e** The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Huron County, which is identified as a P- county.

**B. Operational Restrictions**

- 1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.
- 2. The use of cleanup material containing volatile organic compounds, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.
- 3. The use of cleanup material containing hazardous air pollutants, as defined in OAC rule 3745-31-01, in this emissions unit is prohibited.

**C. Monitoring and/or Record keeping Requirements**

- 1. The permittee shall collect and record the following information each day for coating material usage in emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
  - a. the company name and identification for each coating employed;
  - b. documentation of whether or not each coating employed is a photochemically reactive material as defined in OAC rule 3745-21-01;
  - c. the OC content of each coating, as applied, in lbs/gallon;

- d. the number of gallons of each coating employed;
  - e. the OC emission rate for each coating, (c.) x (d.);
  - f. the total OC emission rate for all coatings, summation of (e.);
  - g. the rolling 365-day summation of the total OC emission rate, in tons.
2. The permittee shall collect and record the following each month for cleanup material usage in emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
- a. the company name and identification for each cleanup material employed;
  - b. documentation of whether or not each cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-01;
  - c. documentation of whether or not each cleanup material employed is a volatile organic compound as defined in OAC rule 3745-21-01;
  - d. documentation of whether or not each cleanup material employed is a HAP as defined in OAC rule 3745-31-01.
  - e. the OC content of each cleanup material employed, in lbs/gallon;
  - f. the number of gallons of each cleanup material employed;
  - g. the OC emission rate for each cleanup material, (c.) x (d.);
  - h. the total OC emission rate for all cleanup materials, summation of (e) in tons per month;
  - i. the annual, year to date OC emissions from all cleanup materials employed (sum of (h) for each calendar month to date from January to December).

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used

x solvent density of cleanup material) - (total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material]) x solvent density.

3. The permittee shall collect and record the following information regarding HAP emissions each month for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
  - a. the company identification of each coating employed;
  - b. the lbs/gallon of each individual HAP in each coating, as applied;
  - c. the number of gallons of each coating employed per month;
  - d. the emission rate for each individual HAP from each coating employed, (b.) x (c.);
  - e. the total emission rate for each individual HAP from all coatings employed, summation of (d.), in tons/month;
  - f. the total HAP emission rate for the combination of all HAPs from all coatings employed, summation of (e.) for all HAPs, in tons/month;
  - g. for the first 12 months of operation, under the provisions of this permit the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month; and
  - h. after the first 12 months of operation, under the provisions of this permit, the annual emissions of each individual HAP and the combination of all HAPs, based upon a rolling 12-month summation of the monthly emission rates.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

4. The permit to install for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission

**Autoplas****PTI Application: 02 12652****Issue****Facility ID: 0339010151****Emissions Unit ID: R001**

units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: methyl ethyl ketone

TLV (mg/m<sup>3</sup>): 589.78

Maximum Hourly Emission Rate (lbs/hr): 12.74

Predicted 1-Hour Maximum Ground-Level Concentration (mg/m<sup>3</sup>): 0.31

MAGLC (ug/m<sup>3</sup>): 14.05

Pollutant: 2-butoxyethanol  
TLV (mg/m<sup>3</sup>): 96.66  
Maximum Hourly Emission Rate (lbs/hr): 6.30  
Predicted 1-Hour Maximum Ground-Level Concentration (mg/m<sup>3</sup>): 0.14  
MAGLC (mg/m<sup>3</sup>): 2.31

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
5. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it

Emissions Unit ID: **R001**

conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined, which identify exceedances of any of the following:
  - a. Any exceedances of the 90.0 tons OC per rolling 365-day period.
  - b. Any exceedances of the 9.9 tons of any single HAP per rolling, 12-month period.
  - c. Any exceedances of the 24.9 tons total combined HAP emissions per rolling, 12-month period.
  - d. Any exceedances of the cumulative single HAP emissions as identified in A.2.b for the first 12-months of operation under the provisions of this permit.
  - e. Any exceedances of the cumulative total combined HAP emissions as identified in A.2.b for the first 12-months of operation under the provisions of this permit.
  - f. Any exceedances of the 1,107 lbs NVOC/month from cleanup operations.

The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.

2. The permittee shall notify the Director (Northwest District Office) in writing of any record showing the following:
  - a. the use of photochemically reactive materials, as defined in OAC rule

3745-21-01, in this emissions unit.

- b. the use of cleanup material containing volatile organic compounds, as defined in OAC rule 3745-21-01, in this emissions unit.
- c. the use of cleanup material containing hazardous air pollutants, as defined in OAC rule 3745-31-01, in this emissions unit.

The notification shall include a copy of such record and shall be sent to the Director (Northwest District Office) within 30 days following the end of the calendar month.

#### **E. Testing Requirements**

1. Compliance with the emission limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation  
1.32 lbs OC/hour, 5.78 tons OC/yr

##### Applicable Compliance Method

The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (0.227 gallons per hour) by the maximum OC content of all the coatings (5.80 pounds per gallon).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

The annual allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly emissions of 1.32 lbs by a maximum operating schedule of 8760 hrs/yr divided by 2000 lbs/ton.

- b. Emission Limitation  
90.0 tons OC per rolling, 365-day period from all the emission units identified in A.2.b

##### Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in

section C.1.

c. Emission Limitation

9.9 tons of any single HAP emission per rolling, 12-month period from all the emission units identified in A.2.b

Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in section C.3.

d. Emission Limitation

24.9 tons of total combined HAP emissions per rolling, 12-month period from all the emission units identified in A.2.b

Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in section C.3.

e. Emission Limitation

1,107 lbs NVOC/month, 6.64 tons NVOC/yr from cleanup operations for R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined

Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in section C.2.

**F. Miscellaneous Requirements**

1. The issuance of this permit shall supercede all terms and conditions of PTI #03-7011 issued on 2-24-1993 and PTI #03-8830 issued on 8-30-1995 and modified on 8-27-1997.

Autoplas  
 PTI Application: 03 12652  
 Issue

Facility ID: 0339010151

Emissions Unit ID: R002

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
R002 - Paint Spray Booth #2 in Paint Line #1 (modification to PTI #03-7011 issued on 2-24-93 and PTI #03-8830 issued on 8-30-95 and modified on 8-27-97). Modification is to revise emission limitations.	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-07(G)(2)
		OAC rule 3745-17-07(A)
		OAC rule 3745-17-11(B)
	OAC rule 3745-31-05(C)	

Applicable Emissions  
Limitations/Control Measures

1.32 lbs OC/hr, 5.78 tons OC/yr  
from coating operation

1,107 lbs NVOC/month, 6.64  
tons NVOC/yr from cleanup  
operations for R001, R002,  
R003, R004, R005, R006,  
R007, R008, R009, R010,  
R011, R012, and R013  
combined (see B.1., B.2., and  
B.3.)

See A.2.a

90.0 tons OC per rolling,  
365-day period from all the  
emission units identified in  
A.2.b

9.9 tons of any single HAP  
emission per rolling, 12-month  
period from all the emission  
units identified in A.2.b

24.9 tons of total combined  
HAP emissions per rolling,  
12-month period from all the  
emission units identified in  
A.2.b

See B.1

See A.2.d

See A.2.e

## **2. Additional Terms and Conditions**

- 2.a** The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
- 2.b** This permit establishes the following federally enforceable emission limitations for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
- i. 90.00 tons OC per rolling, 12-month period
  - ii. 9.9 tons of any single HAP per rolling, 12-month period
  - iii. 24.9 tons of total combined HAP emissions per rolling, 12-month period

The federally enforceable emission limitations are being established for purposes of avoiding Title V and Maximum Achievable Control Technology (MACT) requirements. For purposes of federal enforceability an restriction on OC effectively restricts volatile organic compounds.

Rolling OC limitations for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 were established in Permit to Install (PTI) #03-PTI #03-8830 issued on 8-30-95 and modified on 8-27-97, and as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable OC restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability, OC limitations effectively restrict VOC emissions.

To ensure federal enforceability of single HAP and total HAP emission restrictions during the first 12 months of operation (following issuance of this permit) for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined, the permittee shall not exceed the cumulative monthly emissions specified in the following table:

Month	Any single HAP emission, in tons	Total HAP emissions, in tons
1	1.65	4.15
1-2	3.30	9.30
1-3	4.95	12.45
1-4	6.60	16.60
1-5	8.25	20.75

1-12	9.90	24.90
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- 2.c** The hourly and annual emission limitations from coating operations represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitations.
- 2.d** This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.e** The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Huron County, which is identified as a P- county.

## **B. Operational Restrictions**

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.
2. The use of cleanup material containing volatile organic compounds, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.
3. The use of cleanup material containing hazardous air pollutants, as defined in OAC rule 3745-31-01, in this emissions unit is prohibited.

## **C. Monitoring and/or Record keeping Requirements**

1. The permittee shall collect and record the following information each day for coating material usage in emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
  - a. the company name and identification for each coating employed;
  - b. documentation of whether or not each coating employed is a photochemically reactive material as defined in OAC rule 3745-21-01;
  - c. the OC content of each coating, as applied, in lbs/gallon;

- d. the number of gallons of each coating employed;
  - e. the OC emission rate for each coating, (c.) x (d.);
  - f. the total OC emission rate for all coatings, summation of (e.); and
  - g. the rolling 365-day summation of the total OC emission rate, in tons.
2. The permittee shall collect and record the following each month for cleanup material usage in emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
- a. the company name and identification for each cleanup material employed;
  - b. documentation of whether or not each cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-01;
  - c. documentation of whether or not each cleanup material employed is a volatile organic compound as defined in OAC rule 3745-21-01;
  - d. documentation of whether or not each cleanup material employed is a HAP as defined in OAC rule 3745-31-01;
  - e. the OC content of each cleanup material employed, in lbs/gallon;
  - f. the number of gallons of each cleanup material employed;
  - g. the OC emission rate for each cleanup material, (c.) x (d.);
  - h. the total OC emission rate for all cleanup materials, summation of (e.) in tons per month; and
  - i. the annual, year to date OC emissions from all cleanup materials employed (sum of (h.) for each calendar month to date from January to December).

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used

x solvent density of cleanup material) - (total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material]) x solvent density.

3. The permittee shall collect and record the following information regarding HAP emissions each month for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:

- a. the company identification of each coating employed;
- b. the lbs/gallon of each individual HAP in each coating, as applied;
- c. the number of gallons of each coating employed per month;
- d. the emission rate for each individual HAP from each coating employed, (b.) x (c.);
- e. the total emission rate for each individual HAP from all coatings employed, summation of (d.), in tons/month;
- f. the total HAP emission rate for the combination of all HAPs from all coatings employed, summation of (e.) for all HAPs, in tons/month;
- g. for the first 12 months of operation, under the provisions of this permit the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month; and
- h. after the first 12 months of operation, under the provisions of this permit, the annual emissions of each individual HAP and the combination of all HAPs, based upon a rolling 12-month summation of the monthly emission rates.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

4. The permit to install for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: methyl ethyl ketone  
TLV (mg/m3): 589.78

**Autoplas**  
**PTI Application: 02 12652**  
**Issue**

**Facility ID: 0339010151**

**Emissions Unit ID: R002**

Maximum Hourly Emission Rate (lbs/hr): 12.74

Predicted 1-Hour Maximum Ground-Level Concentration (mg/m<sup>3</sup>): 0.31

MAGLC (ug/m<sup>3</sup>): 14.05

Pollutant: 2-butoxyethanol  
TLV (mg/m3): 96.66

Maximum Hourly Emission Rate (lbs/hr): 6.30  
Predicted 1-Hour Maximum Ground-Level Concentration (mg/m3): 0.14  
MAGLC (mg/m3): 2.31

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
5. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined, which identify exceedances of any of the following:
  - a. Any exceedances of the 90.0 tons OC per rolling 365-day period.
  - b. Any exceedances of the 9.9 tons of any single HAP per rolling, 12-month period.
  - c. Any exceedances of the 24.9 tons total combined HAP emissions per rolling, 12-month period.
  - d. Any exceedances of the cumulative single HAP emissions as identified in A.2.b for the first 12-months of operation under the provisions of this permit.
  - e. Any exceedances of the cumulative total combined HAP emissions as identified in A.2.b for the first 12-months of operation under the provisions of this permit.
  - f. Any exceedances of the 1,107 lbs NVOC/month from cleanup operations.

The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.

2. The permittee shall notify the Director (Northwest District Office) in writing of any record showing the following:

- a. the use of photochemically reactive materials, as defined in OAC rule 3745-21-01, in this emissions unit.
- b. the use of cleanup material containing volatile organic compounds, as defined in OAC rule 3745-21-01, in this emissions unit.
- c. the use of cleanup material containing hazardous air pollutants, as defined in OAC rule 3745-31-01, in this emissions unit.

The notification shall include a copy of such record and shall be sent to the Director (Northwest District Office) within 30 days following the end of the calendar month.

## **E. Testing Requirements**

1. Compliance with the emission limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation  
1.32 lbs OC/hour, 5.78 tons OC/yr

### Applicable Compliance Method

The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (0.227 gallons per hour) by the maximum OC content of all the coatings (5.80 pounds per gallon).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

The annual allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly emissions of 1.32 lbs by a maximum operating schedule of 8760 hrs/yr divided by 2000 lbs/ton.

- b. Emission Limitation  
90.0 tons OC per rolling, 365-day period from all the emission units identified in A.2.b

### Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in section C.1.

- c. Emission Limitation  
9.9 tons of any single HAP emission per rolling, 12-month period from all the emission units identified in A.2.b

Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in section C.3.

- d. Emission Limitation  
24.9 tons of total combined HAP emissions per rolling, 12-month period from all the emission units identified in A.2.b

Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in section C.3.

- e. Emission Limitation  
1,107 lbs NVOC/month, 6.64 tons NVOC/yr from cleanup operations for R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined

Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in section C.2.

**F. Miscellaneous Requirements**

1. The issuance of this permit shall supercede all terms and conditions of PTI #03-7011 issued on 2-24-1993 and PTI #03-8830 issued on 8-30-1995 and modified on 8-27-1997.

Autoplas  
PTI Application: 03-12652  
Issue

Facility ID: 0339010151

Emissions Unit ID: R003

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

- The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
R003 - Paint Spray Booth #3 in Paint Line #2 (modification to PTI #03-7011 issued on 2-24-93 and PTI #03-8830 issued on 8-30-95 and modified on 8-27-97). Modification is to revise emission limitations	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-07(G)(2)
		OAC rule 3745-17-07(A)
		OAC rule 3745-17-11(B)
	OAC rule 3745-31-05(C)	

Applicable Emissions  
Limitations/Control Measures

1.32 lbs OC/hr, 5.78 tons OC/yr  
from coating operation

1,107 lbs NVOC/month, 6.64  
tons NVOC/yr from cleanup  
operations for R001, R002,  
R003, R004, R005, R006,  
R007, R008, R009, R010,  
R011, R012, and R013  
combined (see B.1., B.2., and  
B.3.)

See A.2.a

90.0 tons OC per rolling,  
365-day period from all the  
emission units identified in  
A.2.b

9.9 tons of any single HAP  
emission per rolling, 12-month  
period from all the emission  
units identified in A.2.b

24.9 tons of total combined  
HAP emissions per rolling,  
12-month period from all the  
emission units identified in  
A.2.b

See B.1

See A.2.d

See A.2.e

## 2. Additional Terms and Conditions

- 2.a** The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
- 2.b** This permit establishes the following federally enforceable emission limitations for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
- i. 90.00 tons OC per rolling, 12-month period
  - ii. 9.9 tons of any single HAP per rolling, 12-month period
  - iii. 24.9 tons of total combined HAP emissions per rolling, 12-month period

The federally enforceable emission limitations are being established for purposes of avoiding Title V and Maximum Achievable Control Technology (MACT) requirements. For purposes of federal enforceability an restriction on OC effectively restricts volatile organic compounds.

Rolling OC limitations for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 were established in Permit to Install (PTI) #03-PTI #03-8830 issued on 8-30-95 and modified on 8-27-97, and as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable OC restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability, OC limitations effectively restrict VOC emissions.

To ensure federal enforceability of single HAP and total HAP emission restrictions during the first 12 months of operation (following issuance of this permit) for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined, the permittee shall not exceed the cumulative monthly emissions specified in the following table:

Month	Any single HAP emission, in tons	Total HAP emissions, in tons
1	1.65	4.15
1-2	3.30	9.30
1-3	4.95	12.45
1-4	6.60	16.60
1-5	8.25	20.75

1-12	9.90	24.90
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- 2.c** The hourly and annual emission limitations from coating operations represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitations.
- 2.d** This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.e** The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Huron County, which is identified as a P- county.

## **B. Operational Restrictions**

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.
2. The use of cleanup material containing volatile organic compounds, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.
3. The use of cleanup material containing hazardous air pollutants, as defined in OAC rule 3745-31-01, in this emissions unit is prohibited.

## **C. Monitoring and/or Record keeping Requirements**

1. The permittee shall collect and record the following information each day for coating material usage in emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
  - a. the company name and identification for each coating employed;
  - b. documentation of whether or not each coating employed is a photochemically reactive material as defined in OAC rule 3745-21-01;
  - c. the OC content of each coating, as applied, in lbs/gallon;

- d. the number of gallons of each coating employed;
  - e. the OC emission rate for each coating, (c.) x (d.);
  - f. the total OC emission rate for all coatings, summation of (e.); and
  - g. the rolling 365-day summation of the total OC emission rate, in tons.
2. The permittee shall collect and record the following each month for cleanup material usage in emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
- a. the company name and identification for each cleanup material employed;
  - b. documentation of whether or not each cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-01;
  - c. documentation of whether or not each cleanup material employed is a volatile organic compound as defined in OAC rule 3745-21-01;
  - d. documentation of whether or not each cleanup material employed is a HAP as defined in OAC rule 3745-31-01;
  - e. the OC content of each cleanup material employed, in lbs/gallon;
  - f. the number of gallons of each cleanup material employed;
  - g. the OC emission rate for each cleanup material, (c.) x (d.);
  - h. the total OC emission rate for all cleanup materials, summation of (e.) in tons per month; and
  - i. the annual, year to date OC emissions from all cleanup materials employed (sum of (h.) for each calendar month to date from January to December).

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used

x solvent density of cleanup material) - (total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material]) x solvent density.

3. The permittee shall collect and record the following information regarding HAP emissions each month for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:

- a. the company identification of each coating employed;
- b. the lbs/gallon of each individual HAP in each coating, as applied;
- c. the number of gallons of each coating employed per month;
- d. the emission rate for each individual HAP from each coating employed, (b.) x (c.);
- e. the total emission rate for each individual HAP from all coatings employed, summation of (d.), in tons/month;
- f. the total HAP emission rate for the combination of all HAPs from all coatings employed, summation of (e.) for all HAPs, in tons/month;
- g. for the first 12 months of operation, under the provisions of this permit the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month; and
- h. after the first 12 months of operation, under the provisions of this permit, the annual emissions of each individual HAP and the combination of all HAPs, based upon a rolling 12-month summation of the monthly emission rates.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

4. The permit to install for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: methyl ethyl ketone  
TLV (mg/m3): 589.78

**Autoplas**  
**PTI Application: 02 12652**  
**Issue**

**Facility ID: 0339010151**

**Emissions Unit ID: R003**

Maximum Hourly Emission Rate (lbs/hr): 12.74

Predicted 1-Hour Maximum Ground-Level Concentration (mg/m3): 0.31

MAGLC (ug/m3): 14.05

Pollutant: 2-butoxyethanol  
TLV (mg/m<sup>3</sup>): 96.66  
Maximum Hourly Emission Rate (lbs/hr): 6.30  
Predicted 1-Hour Maximum Ground-Level Concentration (mg/m<sup>3</sup>): 0.14  
MAGLC (mg/m<sup>3</sup>): 2.31

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
5. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it

conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined, which identify exceedances of any of the following:
  - a. Any exceedances of the 90.0 tons OC per rolling 365-day period.
  - b. Any exceedances of the 9.9 tons of any single HAP per rolling, 12-month period.
  - c. Any exceedances of the 24.9 tons total combined HAP emissions per rolling, 12-month period.
  - d. Any exceedances of the cumulative single HAP emissions as identified in A.2.b for the first 12-months of operation under the provisions of this permit.
  - e. Any exceedances of the cumulative total combined HAP emissions as identified in A.2.b for the first 12-months of operation under the provisions of this permit.
  - f. Any exceedances of the 1,107 lbs NVOC/month from cleanup operations.

The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.

2. The permittee shall notify the Director (Northwest District Office) in writing of any record showing the following:
  - a. the use of photochemically reactive materials, as defined in OAC rule

3745-21-01, in this emissions unit.

- b. the use of cleanup material containing volatile organic compounds, as defined in OAC rule 3745-21-01, in this emissions unit.
- c. the use of cleanup material containing hazardous air pollutants, as defined in OAC rule 3745-31-01, in this emissions unit.

The notification shall include a copy of such record and shall be sent to the Director (Northwest District Office) within 30 days following the end of the calendar month.

## E. Testing Requirements

1. Compliance with the emission limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation  
 1.32 lbs OC/hour, 5.78 tons OC/yr

### Applicable Compliance Method

The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (0.227 gallons per hour) by the maximum OC content of all the coatings (5.80 pounds per gallon).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

The annual allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly emissions of 1.32 lbs by a maximum operating schedule of 8760 hrs/yr divided by 2000 lbs/ton.

- b. Emission Limitation  
 90.0 tons OC per rolling, 365-day period from all the emission units identified in A.2.b

### Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in section C.1.

- c. Emission Limitation  
9.9 tons of any single HAP emission per rolling, 12-month period from all the emission units identified in A.2.b  
  
Applicable Compliance Method  
Compliance shall be demonstrated by the monitoring and record keeping in section C.3.
  
- d. Emission Limitation  
24.9 tons of total combined HAP emissions per rolling, 12-month period from all the emission units identified in A.2.b

Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in section C.3.

e. Emission Limitation

1,107 lbs NVOC/month, 6.64 tons NVOC/yr from cleanup operations for R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined

Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in section C.2.

**F. Miscellaneous Requirements**

1. The issuance of this permit shall supercede all terms and conditions of PTI #03-7011 issued on 2-24-1993 and PTI #03-8830 issued on 8-30-1995 and modified on 8-27-1997.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
R004 - Paint Spray Booth #4 in Paint Line #2 (modification to PTI #03-7011 issued on 2-24-93 and PTI #03-8830 issued on 8-30-95 and modified on 8-27-97). Modification is to revise emission limitations	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-07(G)(2) OAC rule 3745-17-07(A)
	OAC rule 3745-31-05(C)	OAC rule 3745-17-11(B)

**Autox  
PTI A  
Issued: 4/3/2007**

Emissions Unit ID: **R004**

Applicable Emissions  
Limitations/Control Measures

1.32 lbs OC/hr, 5.78 tons OC/yr  
from coating operation

1,107 lbs NVOC/month, 6.64  
tons NVOC/yr from cleanup  
operations for R001, R002,  
R003, R004, R005, R006,  
R007, R008, R009, R010,  
R011, R012, and R013  
combined (see B.1., B.2., and  
B.3.)

See A.2.a

90.0 tons OC per rolling,  
365-day period from all the  
emission units identified in  
A.2.b

9.9 tons of any single HAP  
emission per rolling, 12-month  
period from all the emission  
units identified in A.2.b

24.9 tons of total combined  
HAP emissions per rolling,  
12-month period from all the  
emission units identified in  
A.2.b

See B.1

See A.2.d

See A.2.e

## 2. Additional Terms and Conditions

- 2.a** The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
- 2.b** This permit establishes the following federally enforceable emission limitations for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
- i. 90.00 tons OC per rolling, 12-month period
  - ii. 9.9 tons of any single HAP per rolling, 12-month period
  - iii. 24.9 tons of total combined HAP emissions per rolling, 12-month period

The federally enforceable emission limitations are being established for purposes of avoiding Title V and Maximum Achievable Control Technology (MACT) requirements. For purposes of federal enforceability an restriction on OC effectively restricts volatile organic compounds.

Rolling OC limitations for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 were established in Permit to Install (PTI) #03-PTI #03-8830 issued on 8-30-95 and modified on 8-27-97, and as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable OC restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability, OC limitations effectively restrict VOC emissions.

To ensure federal enforceability of single HAP and total HAP emission restrictions during the first 12 months of operation (following issuance of this permit) for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined, the permittee shall not exceed the cumulative monthly emissions specified in the following table:

Month	Any single HAP emission, in tons	Total HAP emissions, in tons
1	1.65	4.15
1-2	3.30	9.30
1-3	4.95	12.45
1-4	6.60	16.60
1-5	8.25	20.75
1-12	9.90	24.90

- 2.c** The hourly and annual emission limitations from coating operations represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitations.
- 2.d** This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.e** The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Huron County, which is identified as a P- county.

## **B. Operational Restrictions**

- 1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.
- 2. The use of cleanup material containing volatile organic compounds, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.
- 3. The use of cleanup material containing hazardous air pollutants, as defined in OAC rule 3745-31-01, in this emissions unit is prohibited.

## **C. Monitoring and/or Record keeping Requirements**

- 1. The permittee shall collect and record the following information each day for coating material usage in emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
  - a. the company name and identification for each coating employed;
  - b. documentation of whether or not each coating employed is a photochemically reactive material as defined in OAC rule 3745-21-01;
  - c. the OC content of each coating, as applied, in lbs/gallon;

- d. the number of gallons of each coating employed;
  - e. the OC emission rate for each coating, (c.) x (d.);
  - f. the total OC emission rate for all coatings, summation of (e.); and
  - g. the rolling 365-day summation of the total OC emission rate, in tons.
2. The permittee shall collect and record the following each month for cleanup material usage in emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
- a. the company name and identification for each cleanup material employed;
  - b. documentation of whether or not each cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-01;
  - c. documentation of whether or not each cleanup material employed is a volatile organic compound as defined in OAC rule 3745-21-01;
  - d. documentation of whether or not each cleanup material employed is a HAP as defined in OAC rule 3745-31-01;
  - e. the OC content of each cleanup material employed, in lbs/gallon;
  - f. the number of gallons of each cleanup material employed;
  - g. the OC emission rate for each cleanup material, (c.) x (d.);
  - h. the total OC emission rate for all cleanup materials, summation of (e.) in tons per month; and
  - i. the annual, year to date OC emissions from all cleanup materials employed (sum of (h.) for each calendar month to date from January to December).

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used

x solvent density of cleanup material) - (total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material]) x solvent density.

3. The permittee shall collect and record the following information regarding HAP emissions each month for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
  - a. the company identification of each coating employed;
  - b. the lbs/gallon of each individual HAP in each coating, as applied;
  - c. the number of gallons of each coating employed per month;
  - d. the emission rate for each individual HAP from each coating employed, (b.) x (c.);
  - e. the total emission rate for each individual HAP from all coatings employed, summation of (d.), in tons/month;
  - f. the total HAP emission rate for the combination of all HAPs from all coatings employed, summation of (e.) for all HAPs, in tons/month;
  - g. for the first 12 months of operation, under the provisions of this permit the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month; and
  - h. after the first 12 months of operation, under the provisions of this permit, the annual emissions of each individual HAP and the combination of all HAPs, based upon a rolling 12-month summation of the monthly emission rates.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

4. The permit to install for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission units using data from the permit to install application and the SCREEN 3.0 model (or

**Auto**  
**PTI A**  
**Issued: 4/3/2007**

Emissions Unit ID: **R004**

other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: methyl ethyl ketone

TLV (mg/m<sup>3</sup>): 589.78

Maximum Hourly Emission Rate (lbs/hr): 12.74

Predicted 1-Hour Maximum Ground-Level Concentration (mg/m<sup>3</sup>): 0.31

MAGLC (ug/m<sup>3</sup>): 14.05

Pollutant: 2-butoxyethanol  
TLV (mg/m<sup>3</sup>): 96.66  
Maximum Hourly Emission Rate (lbs/hr): 6.30  
Predicted 1-Hour Maximum Ground-Level Concentration (mg/m<sup>3</sup>): 0.14  
MAGLC (mg/m<sup>3</sup>): 2.31

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
5. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it

conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined, which identify exceedances of any of the following:
  - a. Any exceedances of the 90.0 tons OC per rolling 365-day period.
  - b. Any exceedances of the 9.9 tons of any single HAP per rolling, 12-month period.
  - c. Any exceedances of the 24.9 tons total combined HAP emissions per rolling, 12-month period.
  - d. Any exceedances of the cumulative single HAP emissions as identified in A.2.b for the first 12-months of operation under the provisions of this permit.
  - e. Any exceedances of the cumulative total combined HAP emissions as identified in A.2.b for the first 12-months of operation under the provisions of this permit.
  - f. Any exceedances of the 1,107 lbs NVOC/month from cleanup operations.

The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.

2. The permittee shall notify the Director (Northwest District Office) in writing of any record showing the following:
  - a. the use of photochemically reactive materials, as defined in OAC rule

3745-21-01, in this emissions unit.

- b. the use of cleanup material containing volatile organic compounds, as defined in OAC rule 3745-21-01, in this emissions unit.
- c. the use of cleanup material containing hazardous air pollutants, as defined in OAC rule 3745-31-01, in this emissions unit.

The notification shall include a copy of such record and shall be sent to the Director (Northwest District Office) within 30 days following the end of the calendar month.

#### **E. Testing Requirements**

1. Compliance with the emission limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation  
1.32 lbs OC/hour, 5.78 tons OC/yr

##### Applicable Compliance Method

The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (0.227 gallons per hour) by the maximum OC content of all the coatings (5.80 pounds per gallon).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

The annual allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly emissions of 1.32 lbs by a maximum operating schedule of 8760 hrs/yr divided by 2000 lbs/ton.

- b. Emission Limitation  
90.0 tons OC per rolling, 365-day period from all the emission units identified in A.2.b

##### Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in

**Autoplas****PTI Application: 03-12652****Issue****Facility ID: 0339010151****Emissions Unit ID: R004**

section C.1.

c. Emission Limitation

9.9 tons of any single HAP emission per rolling, 12-month period from all the emission units identified in A.2.b

Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in section C.3.

d. Emission Limitation

24.9 tons of total combined HAP emissions per rolling, 12-month period from all the emission units identified in A.2.b

Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in section C.3.

e. Emission Limitation

1,107 lbs NVOC/month, 6.64 tons NVOC/yr from cleanup operations for R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined

Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in section C.2.

**F. Miscellaneous Requirements**

1. The issuance of this permit shall supercede all terms and conditions of PTI #03-7011 issued on 2-24-1993 and PTI #03-8830 issued on 8-30-1995 and modified on 8-27-1997.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
R005 - Paint Spray Booth #5 in Paint Line #3 (modification to PTI #03-7011 issued on 2-24-93 and PTI #03-8830 issued on 8-30-95 and modified on 8-27-97). Modification is to revise emission limitations	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-07(G)(2)
		OAC rule 3745-17-07(A)
		OAC rule 3745-17-11(B)
	OAC rule 3745-31-05(C)	

Applicable Emissions  
Limitations/Control Measures

1.32 lbs OC/hr, 5.78 tons OC/yr  
from coating operation

1,107 lbs NVOC/month, 6.64  
tons NVOC/yr from cleanup  
operations for R001, R002,  
R003, R004, R005, R006,  
R007, R008, R009, R010,  
R011, R012, and R013  
combined (see B.1., B.2., and  
B.3.)

See A.2.a

90.0 tons OC per rolling,  
365-day period from all the  
emission units identified in  
A.2.b

9.9 tons of any single HAP  
emission per rolling, 12-month  
period from all the emission  
units identified in A.2.b

24.9 tons of total combined  
HAP emissions per rolling,  
12-month period from all the  
emission units identified in  
A.2.b

See B.1

See A.2.d

See A.2.e

## 2. Additional Terms and Conditions

- 2.a** The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
- 2.b** This permit establishes the following federally enforceable emission limitations for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
- i. 90.00 tons OC per rolling, 12-month period
  - ii. 9.9 tons of any single HAP per rolling, 12-month period
  - iii. 24.9 tons of total combined HAP emissions per rolling, 12-month period

The federally enforceable emission limitations are being established for purposes of avoiding Title V and Maximum Achievable Control Technology (MACT) requirements. For purposes of federal enforceability an restriction on OC effectively restricts volatile organic compounds.

Rolling OC limitations for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 were established in Permit to Install (PTI) #03-PTI #03-8830 issued on 8-30-95 and modified on 8-27-97, and as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable OC restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability, OC limitations effectively restrict VOC emissions.

To ensure federal enforceability of single HAP and total HAP emission restrictions during the first 12 months of operation (following issuance of this permit) for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined, the permittee shall not exceed the cumulative monthly emissions specified in the following table:

Month	Any single HAP emission, in tons	Total HAP emissions, in tons
1	1.65	4.15
1-2	3.30	9.30
1-3	4.95	12.45
1-4	6.60	16.60
1-5	8.25	20.75
1-12	9.90	24.90

- 2.c** The hourly and annual emission limitations from coating operations represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitations.
- 2.d** This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.e** The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Huron County, which is identified as a P- county.

## **B. Operational Restrictions**

- 1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.
- 2. The use of cleanup material containing volatile organic compounds, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.
- 3. The use of cleanup material containing hazardous air pollutants, as defined in OAC rule 3745-31-01, in this emissions unit is prohibited.

## **C. Monitoring and/or Record keeping Requirements**

- 1. The permittee shall collect and record the following information each day for coating material usage in emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
  - a. the company name and identification for each coating employed;
  - b. documentation of whether or not each coating employed is a photochemically reactive material as defined in OAC rule 3745-21-01;
  - c. the OC content of each coating, as applied, in lbs/gallon;

- d. the number of gallons of each coating employed;
  - e. the OC emission rate for each coating, (c.) x (d.);
  - f. the total OC emission rate for all coatings, summation of (e.); and
  - g. the rolling 365-day summation of the total OC emission rate, in tons.
2. The permittee shall collect and record the following each month for cleanup material usage in emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
- a. the company name and identification for each cleanup material employed;
  - b. documentation of whether or not each cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-01;
  - c. documentation of whether or not each cleanup material employed is a volatile organic compound as defined in OAC rule 3745-21-01;
  - d. documentation of whether or not each cleanup material employed is a HAP as defined in OAC rule 3745-31-01;
  - e. the OC content of each cleanup material employed, in lbs/gallon;
  - f. the number of gallons of each cleanup material employed;
  - g. the OC emission rate for each cleanup material, (c.) x (d.);
  - h. the total OC emission rate for all cleanup materials, summation of (e.) in tons per month; and
  - i. the annual, year to date OC emissions from all cleanup materials employed (sum of (h.) for each calendar month to date from January to December).

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used

Emissions Unit ID: **R005**

x solvent density of cleanup material) - (total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material]) x solvent density.

3. The permittee shall collect and record the following information regarding HAP emissions each month for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
  - a. the company identification of each coating employed;
  - b. the lbs/gallon of each individual HAP in each coating, as applied;
  - c. the number of gallons of each coating employed per month;
  - d. the emission rate for each individual HAP from each coating employed, (b.) x (c.);
  - e. the total emission rate for each individual HAP from all coatings employed, summation of (d.), in tons/month;
  - f. the total HAP emission rate for the combination of all HAPs from all coatings employed, summation of (e.) for all HAPs, in tons/month;
  - g. for the first 12 months of operation, under the provisions of this permit the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month; and
  - h. after the first 12 months of operation, under the provisions of this permit, the annual emissions of each individual HAP and the combination of all HAPs, based upon a rolling 12-month summation of the monthly emission rates.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

4. The permit to install for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission units using data from the permit to install application and the SCREEN 3.0 model (or

other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: methyl ethyl ketone

TLV (mg/m<sup>3</sup>): 589.78

Maximum Hourly Emission Rate (lbs/hr): 12.74

Predicted 1-Hour Maximum Ground-Level Concentration (mg/m<sup>3</sup>): 0.31

MAGLC (ug/m<sup>3</sup>): 14.05

Pollutant: 2-butoxyethanol  
TLV (mg/m<sup>3</sup>): 96.66  
Maximum Hourly Emission Rate (lbs/hr): 6.30  
Predicted 1-Hour Maximum Ground-Level Concentration (mg/m<sup>3</sup>): 0.14  
MAGLC (mg/m<sup>3</sup>): 2.31

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
5. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it

conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined, which identify exceedances of any of the following:
  - a. Any exceedances of the 90.0 tons OC per rolling 365-day period.
  - b. Any exceedances of the 9.9 tons of any single HAP per rolling, 12-month period.
  - c. Any exceedances of the 24.9 tons total combined HAP emissions per rolling, 12-month period.
  - d. Any exceedances of the cumulative single HAP emissions as identified in A.2.b for the first 12-months of operation under the provisions of this permit.
  - e. Any exceedances of the cumulative total combined HAP emissions as identified in A.2.b for the first 12-months of operation under the provisions of this permit.
  - f. Any exceedances of the 1,107 lbs NVOC/month from cleanup operations.

The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.

2. The permittee shall notify the Director (Northwest District Office) in writing of any record showing the following:
  - a. the use of photochemically reactive materials, as defined in OAC rule

3745-21-01, in this emissions unit.

- b. the use of cleanup material containing volatile organic compounds, as defined in OAC rule 3745-21-01, in this emissions unit.
- c. the use of cleanup material containing hazardous air pollutants, as defined in OAC rule 3745-31-01, in this emissions unit.

The notification shall include a copy of such record and shall be sent to the Director (Northwest District Office) within 30 days following the end of the calendar month.

## **E. Testing Requirements**

1. Compliance with the emission limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation  
1.32 lbs OC/hour, 5.78 tons OC/yr

### Applicable Compliance Method

The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (0.227 gallons per hour) by the maximum OC content of all the coatings (5.80 pounds per gallon).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

The annual allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly emissions of 1.32 lbs by a maximum operating schedule of 8760 hrs/yr divided by 2000 lbs/ton.

- b. Emission Limitation  
90.0 tons OC per rolling, 365-day period from all the emission units identified in A.2.b

### Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in

**Autoplas****PTI Application: 03-12652****Issue****Facility ID: 0339010151****Emissions Unit ID: R005**

section C.1.

c. Emission Limitation

9.9 tons of any single HAP emission per rolling, 12-month period from all the emission units identified in A.2.b

Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in section C.3.

d. Emission Limitation

24.9 tons of total combined HAP emissions per rolling, 12-month period from all the emission units identified in A.2.b

Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in section C.3.

e. Emission Limitation

1,107 lbs NVOC/month, 6.64 tons NVOC/yr from cleanup operations for R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined

Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in section C.2.

**F. Miscellaneous Requirements**

1. The issuance of this permit shall supercede all terms and conditions of PTI #03-7011 issued on 2-24-1993 and PTI #03-8830 issued on 8-30-1995 and modified on 8-27-1997.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
R006 - Paint Spray Booth #6 in Paint Line #3 (modification to PTI #03-7011 issued on 2-24-93 and PTI #03-8830 issued on 8-30-95 and modified on 8-27-97). Modification is to revise emission limitations	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-07(G)(2)
		OAC rule 3745-17-07(A)
		OAC rule 3745-17-11(B)
	OAC rule 3745-31-05(C)	

Applicable Emissions  
Limitations/Control Measures

1.32 lbs OC/hr, 5.78 tons OC/yr  
from coating operation

1,107 lbs NVOC/month, 6.64  
tons NVOC/yr from cleanup  
operations for R001, R002,  
R003, R004, R005, R006,  
R007, R008, R009, R010,  
R011, R012, and R013  
combined (see B.1., B.2., and  
B.3.)

See A.2.a

90.0 tons OC per rolling,  
365-day period from all the  
emission units identified in  
A.2.b

9.9 tons of any single HAP  
emission per rolling, 12-month  
period from all the emission  
units identified in A.2.b

24.9 tons of total combined  
HAP emissions per rolling,  
12-month period from all the  
emission units identified in  
A.2.b

See B.1

See A.2.d

See A.2.e

## 2. Additional Terms and Conditions

- 2.a** The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
- 2.b** This permit establishes the following federally enforceable emission limitations for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
- i. 90.00 tons OC per rolling, 12-month period
  - ii. 9.9 tons of any single HAP per rolling, 12-month period
  - iii. 24.9 tons of total combined HAP emissions per rolling, 12-month period

The federally enforceable emission limitations are being established for purposes of avoiding Title V and Maximum Achievable Control Technology (MACT) requirements. For purposes of federal enforceability an restriction on OC effectively restricts volatile organic compounds.

Rolling OC limitations for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 were established in Permit to Install (PTI) #03-PTI #03-8830 issued on 8-30-95 and modified on 8-27-97, and as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable OC restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability, OC limitations effectively restrict VOC emissions.

To ensure federal enforceability of single HAP and total HAP emission restrictions during the first 12 months of operation (following issuance of this permit) for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined, the permittee shall not exceed the cumulative monthly emissions specified in the following table:

Month	Any single HAP emission, in tons	Total HAP emissions, in tons
1	1.65	4.15
1-2	3.30	9.30
1-3	4.95	12.45
1-4	6.60	16.60
1-5	8.25	20.75
1-12	9.90	24.90

- 2.c** The hourly and annual emission limitations from coating operations represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitations.
- 2.d** This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.e** The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Huron County, which is identified as a P- county.

## **B. Operational Restrictions**

- 1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.
- 2. The use of cleanup material containing volatile organic compounds, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.
- 3. The use of cleanup material containing hazardous air pollutants, as defined in OAC rule 3745-31-01, in this emissions unit is prohibited.

## **C. Monitoring and/or Record keeping Requirements**

- 1. The permittee shall collect and record the following information each day for coating material usage in emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
  - a. the company name and identification for each coating employed;
  - b. documentation of whether or not each coating employed is a photochemically reactive material as defined in OAC rule 3745-21-01;
  - c. the OC content of each coating, as applied, in lbs/gallon;

- d. the number of gallons of each coating employed;
  - e. the OC emission rate for each coating, (c.) x (d.);
  - f. the total OC emission rate for all coatings, summation of (e.); and
  - g. the rolling 365-day summation of the total OC emission rate, in tons.
2. The permittee shall collect and record the following each month for cleanup material usage in emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
- a. the company name and identification for each cleanup material employed;
  - b. documentation of whether or not each cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-01;
  - c. documentation of whether or not each cleanup material employed is a volatile organic compound as defined in OAC rule 3745-21-01;
  - d. documentation of whether or not each cleanup material employed is a HAP as defined in OAC rule 3745-31-01;
  - e. the OC content of each cleanup material employed, in lbs/gallon;
  - f. the number of gallons of each cleanup material employed;
  - g. the OC emission rate for each cleanup material, (c.) x (d.);
  - h. the total OC emission rate for all cleanup materials, summation of (e.) in tons per month; and
  - i. the annual, year to date OC emissions from all cleanup materials employed (sum of (h.) for each calendar month to date from January to December).

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used

Emissions Unit ID: **R006**

x solvent density of cleanup material) - (total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material]) x solvent density.

3. The permittee shall collect and record the following information regarding HAP emissions each month for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
  - a. the company identification of each coating employed;
  - b. the lbs/gallon of each individual HAP in each coating, as applied;
  - c. the number of gallons of each coating employed per month;
  - d. the emission rate for each individual HAP from each coating employed, (b.) x (c.);
  - e. the total emission rate for each individual HAP from all coatings employed, summation of (d.), in tons/month;
  - f. the total HAP emission rate for the combination of all HAPs from all coatings employed, summation of (e.) for all HAPs, in tons/month;
  - g. for the first 12 months of operation, under the provisions of this permit the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month; and
  - h. after the first 12 months of operation, under the provisions of this permit, the annual emissions of each individual HAP and the combination of all HAPs, based upon a rolling 12-month summation of the monthly emission rates.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

4. The permit to install for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission units using data from the permit to install application and the SCREEN 3.0 model (or

**Auto**  
**PTI A**  
**Issued: 4/3/2007**

Emissions Unit ID: **R006**

other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: methyl ethyl ketone

TLV (mg/m<sup>3</sup>): 589.78

Maximum Hourly Emission Rate (lbs/hr): 12.74

Predicted 1-Hour Maximum Ground-Level Concentration (mg/m<sup>3</sup>): 0.31

MAGLC (ug/m<sup>3</sup>): 14.05

Pollutant: 2-butoxyethanol  
TLV (mg/m<sup>3</sup>): 96.66  
Maximum Hourly Emission Rate (lbs/hr): 6.30  
Predicted 1-Hour Maximum Ground-Level Concentration (mg/m<sup>3</sup>): 0.14  
MAGLC (mg/m<sup>3</sup>): 2.31

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
5. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it

conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined, which identify exceedances of any of the following:
  - a. Any exceedances of the 90.0 tons OC per rolling 365-day period.
  - b. Any exceedances of the 9.9 tons of any single HAP per rolling, 12-month period.
  - c. Any exceedances of the 24.9 tons total combined HAP emissions per rolling, 12-month period.
  - d. Any exceedances of the cumulative single HAP emissions as identified in A.2.b for the first 12-months of operation under the provisions of this permit.
  - e. Any exceedances of the cumulative total combined HAP emissions as identified in A.2.b for the first 12-months of operation under the provisions of this permit.
  - f. Any exceedances of the 1,107 lbs NVOC/month from cleanup operations.

The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.

2. The permittee shall notify the Director (Northwest District Office) in writing of any record showing the following:
  - a. the use of photochemically reactive materials, as defined in OAC rule

3745-21-01, in this emissions unit.

- b. the use of cleanup material containing volatile organic compounds, as defined in OAC rule 3745-21-01, in this emissions unit.
- c. the use of cleanup material containing hazardous air pollutants, as defined in OAC rule 3745-31-01, in this emissions unit.

The notification shall include a copy of such record and shall be sent to the Director (Northwest District Office) within 30 days following the end of the calendar month.

## **E. Testing Requirements**

1. Compliance with the emission limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation  
1.32 lbs OC/hour, 5.78 tons OC/yr

### Applicable Compliance Method

The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (0.227 gallons per hour) by the maximum OC content of all the coatings (5.80 pounds per gallon).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

The annual allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly emissions of 1.32 lbs by a maximum operating schedule of 8760 hrs/yr divided by 2000 lbs/ton.

- b. Emission Limitation  
90.0 tons OC per rolling, 365-day period from all the emission units identified in A.2.b

### Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in

**Autoplas****PTI Application: 02-12652****Issue****Facility ID: 0339010151****Emissions Unit ID: R006**

section C.1.

c. Emission Limitation

9.9 tons of any single HAP emission per rolling, 12-month period from all the emission units identified in A.2.b

Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in section C.3.

d. Emission Limitation

24.9 tons of total combined HAP emissions per rolling, 12-month period from all the emission units identified in A.2.b

Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in section C.3.

e. Emission Limitation

1,107 lbs NVOC/month, 6.64 tons NVOC/yr from cleanup operations for R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined

Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in section C.2.

**F. Miscellaneous Requirements**

1. The issuance of this permit shall supercede all terms and conditions of PTI #03-7011 issued on 2-24-1993 and PTI #03-8830 issued on 8-30-1995 and modified on 8-27-1997.

Autox  
PTI A  
Issued: 4/3/2007

Emissions Unit ID: **R007**

## PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

### A. Applicable Emissions Limitations and/or Control Requirements

- The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
R007 - Paint Spray Booth #7 in Paint Line #4 (modification to PTI #03-7011 issued on 2-24-93 and PTI #03-8830 issued on 8-30-95 and modified on 8-27-97). Modification is to revise emission limitations	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-07(G)(2) OAC rule 3745-17-07(A) OAC rule 3745-17-11(B)
	OAC rule 3745-31-05(C)	

Applicable Emissions  
Limitations/Control Measures

1.32 lbs OC/hr, 5.78 tons OC/yr  
from coating operation

1,107 lbs NVOC/month, 6.64  
tons NVOC/yr from cleanup  
operations for R001, R002,  
R003, R004, R005, R006,  
R007, R008, R009, R010,  
R011, R012, and R013  
combined (see B.1., B.2., and  
B.3.)

See A.2.a

90.0 tons OC per rolling,  
365-day period from all the  
emission units identified in  
A.2.b

9.9 tons of any single HAP  
emission per rolling, 12-month  
period from all the emission  
units identified in A.2.b

24.9 tons of total combined  
HAP emissions per rolling,  
12-month period from all the  
emission units identified in  
A.2.b

See B.1

See A.2.d

See A.2.e

## 2. Additional Terms and Conditions

- 2.a** The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
- 2.b** This permit establishes the following federally enforceable emission limitations for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
- i. 90.00 tons OC per rolling, 12-month period
  - ii. 9.9 tons of any single HAP per rolling, 12-month period
  - iii. 24.9 tons of total combined HAP emissions per rolling, 12-month period

The federally enforceable emission limitations are being established for purposes of avoiding Title V and Maximum Achievable Control Technology (MACT) requirements. For purposes of federal enforceability an restriction on OC effectively restricts volatile organic compounds.

Rolling OC limitations for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 were established in Permit to Install (PTI) #03-PTI #03-8830 issued on 8-30-95 and modified on 8-27-97, and as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable OC restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability, OC limitations effectively restrict VOC emissions.

To ensure federal enforceability of single HAP and total HAP emission restrictions during the first 12 months of operation (following issuance of this permit) for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined, the permittee shall not exceed the cumulative monthly emissions specified in the following table:

Month	Any single HAP emission, in tons	Total HAP emissions, in tons
1	1.65	4.15
1-2	3.30	9.30
1-3	4.95	12.45
1-4	6.60	16.60
1-5	8.25	20.75

**Autoplas**  
**PTI Application: 02-12652**  
**Issue**

**Facility ID: 0339010151**

**Emissions Unit ID: R007**

1-12	9.90	24.90
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- 2.c** The hourly and annual emission limitations from coating operations represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitations.
- 2.d** This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.e** The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Huron County, which is identified as a P- county.

## **B. Operational Restrictions**

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.
2. The use of cleanup material containing volatile organic compounds, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.
3. The use of cleanup material containing hazardous air pollutants, as defined in OAC rule 3745-31-01, in this emissions unit is prohibited.

## **C. Monitoring and/or Record keeping Requirements**

1. The permittee shall collect and record the following information each day for coating material usage in emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
  - a. the company name and identification for each coating employed;
  - b. documentation of whether or not each coating employed is a photochemically reactive material as defined in OAC rule 3745-21-01;
  - c. the OC content of each coating, as applied, in lbs/gallon;

- d. the number of gallons of each coating employed;
  - e. the OC emission rate for each coating, (c.) x (d.);
  - f. the total OC emission rate for all coatings, summation of (e.); and
  - g. the rolling 365-day summation of the total OC emission rate, in tons.
2. The permittee shall collect and record the following each month for cleanup material usage in emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
- a. the company name and identification for each cleanup material employed;
  - b. documentation of whether or not each cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-01;
  - c. documentation of whether or not each cleanup material employed is a volatile organic compound as defined in OAC rule 3745-21-01;
  - d. documentation of whether or not each cleanup material employed is a HAP as defined in OAC rule 3745-31-01;
  - e. the OC content of each cleanup material employed, in lbs/gallon;
  - f. the number of gallons of each cleanup material employed;
  - g. the OC emission rate for each cleanup material, (c.) x (d.);
  - h. the total OC emission rate for all cleanup materials, summation of (e.) in tons per month; and
  - i. the annual, year to date OC emissions from all cleanup materials employed (sum of (h.) for each calendar month to date from January to December).

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used

Emissions Unit ID: R007

x solvent density of cleanup material) - (total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material]) x solvent density.

3. The permittee shall collect and record the following information regarding HAP emissions each month for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
  - a. the company identification of each coating employed;
  - b. the lbs/gallon of each individual HAP in each coating, as applied;
  - c. the number of gallons of each coating employed per month;
  - d. the emission rate for each individual HAP from each coating employed, (b.) x (c.);
  - e. the total emission rate for each individual HAP from all coatings employed, summation of (d.), in tons/month;
  - f. the total HAP emission rate for the combination of all HAPs from all coatings employed, summation of (e.) for all HAPs, in tons/month;
  - g. for the first 12 months of operation, under the provisions of this permit the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month; and
  - h. after the first 12 months of operation, under the provisions of this permit, the annual emissions of each individual HAP and the combination of all HAPs, based upon a rolling 12-month summation of the monthly emission rates.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

4. The permit to install for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission units using data from the permit to install application and the SCREEN 3.0 model (or

**Auto**  
**PTI A**  
**Issued: 4/3/2007**

Emissions Unit ID: **R007**

other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: methyl ethyl ketone

TLV (mg/m<sup>3</sup>): 589.78

Maximum Hourly Emission Rate (lbs/hr): 12.74

Predicted 1-Hour Maximum Ground-Level Concentration (mg/m<sup>3</sup>): 0.31

MAGLC (ug/m<sup>3</sup>): 14.05

Pollutant: 2-butoxyethanol  
TLV (mg/m<sup>3</sup>): 96.66  
Maximum Hourly Emission Rate (lbs/hr): 6.30  
Predicted 1-Hour Maximum Ground-Level Concentration (mg/m<sup>3</sup>): 0.14  
MAGLC (mg/m<sup>3</sup>): 2.31

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
5. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it

conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined, which identify exceedances of any of the following:
  - a. Any exceedances of the 90.0 tons OC per rolling 365-day period.
  - b. Any exceedances of the 9.9 tons of any single HAP per rolling, 12-month period.
  - c. Any exceedances of the 24.9 tons total combined HAP emissions per rolling, 12-month period.
  - d. Any exceedances of the cumulative single HAP emissions as identified in A.2.b for the first 12-months of operation under the provisions of this permit.
  - e. Any exceedances of the cumulative total combined HAP emissions as identified in A.2.b for the first 12-months of operation under the provisions of this permit.
  - f. Any exceedances of the 1,107 lbs NVOC/month from cleanup operations.

The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.

2. The permittee shall notify the Director (Northwest District Office) in writing of any record showing the following:
  - a. the use of photochemically reactive materials, as defined in OAC rule

3745-21-01, in this emissions unit.

- b. the use of cleanup material containing volatile organic compounds, as defined in OAC rule 3745-21-01, in this emissions unit.
- c. the use of cleanup material containing hazardous air pollutants, as defined in OAC rule 3745-31-01, in this emissions unit.

The notification shall include a copy of such record and shall be sent to the Director (Northwest District Office) within 30 days following the end of the calendar month.

#### **E. Testing Requirements**

1. Compliance with the emission limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation  
1.32 lbs OC/hour, 5.78 tons OC/yr

##### Applicable Compliance Method

The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (0.227 gallons per hour) by the maximum OC content of all the coatings (5.80 pounds per gallon).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

The annual allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly emissions of 1.32 lbs by a maximum operating schedule of 8760 hrs/yr divided by 2000 lbs/ton.

- b. Emission Limitation  
90.0 tons OC per rolling, 365-day period from all the emission units identified in A.2.b

##### Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in

**Autoplas****PTI Application: 02-12652****Issue****Facility ID: 0339010151****Emissions Unit ID: R007**

section C.1.

c. Emission Limitation

9.9 tons of any single HAP emission per rolling, 12-month period from all the emission units identified in A.2.b

Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in section C.3.

d. Emission Limitation

24.9 tons of total combined HAP emissions per rolling, 12-month period from all the emission units identified in A.2.b

Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in section C.3.

e. Emission Limitation

1,107 lbs NVOC/month, 6.64 tons NVOC/yr from cleanup operations for R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined

Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in section C.2.

**F. Miscellaneous Requirements**

1. The issuance of this permit shall supercede all terms and conditions of PTI #03-7011 issued on 2-24-1993 and PTI #03-8830 issued on 8-30-1995 and modified on 8-27-1997.

**Autox**  
**PTI A**  
**Issued: 4/3/2007**

Emissions Unit ID: **R008**

## **PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

### **A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
R008 - Paint Spray Booth #8 in Paint Line #4 (modification to PTI #03-7011 issued on 2-24-93 and PTI #03-8830 issued on 8-30-95 and modified on 8-27-97). Modification is to revise emission limitations	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-07(G)(2) OAC rule 3745-17-07(A) OAC rule 3745-17-11(B)
	OAC rule 3745-31-05(C)	

Applicable Emissions  
Limitations/Control Measures

1.32 lbs OC/hr, 5.78 tons OC/yr  
from coating operation

1,107 lbs NVOC/month, 6.64  
tons NVOC/yr from cleanup  
operations for R001, R002,  
R003, R004, R005, R006,  
R007, R008, R009, R010,  
R011, R012, and R013  
combined (see B.1., B.2., and  
B.3.)

See A.2.a

90.0 tons OC per rolling,  
365-day period from all the  
emission units identified in  
A.2.b

9.9 tons of any single HAP  
emission per rolling, 12-month  
period from all the emission  
units identified in A.2.b

24.9 tons of total combined  
HAP emissions per rolling,  
12-month period from all the  
emission units identified in  
A.2.b

See B.1

See A.2.d

See A.2.e

## **2. Additional Terms and Conditions**

- 2.a** The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
- 2.b** This permit establishes the following federally enforceable emission limitations for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
- i. 90.00 tons OC per rolling, 12-month period
  - ii. 9.9 tons of any single HAP per rolling, 12-month period
  - iii. 24.9 tons of total combined HAP emissions per rolling, 12-month period

The federally enforceable emission limitations are being established for purposes of avoiding Title V and Maximum Achievable Control Technology (MACT) requirements. For purposes of federal enforceability an restriction on OC effectively restricts volatile organic compounds.

Rolling OC limitations for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 were established in Permit to Install (PTI) #03-PTI #03-8830 issued on 8-30-95 and modified on 8-27-97, and as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable OC restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability, OC limitations effectively restrict VOC emissions.

To ensure federal enforceability of single HAP and total HAP emission restrictions during the first 12 months of operation (following issuance of this permit) for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined, the permittee shall not exceed the cumulative monthly emissions specified in the following table:

Month	Any single HAP emission, in tons	Total HAP emissions, in tons
1	1.65	4.15
1-2	3.30	9.30
1-3	4.95	12.45
1-4	6.60	16.60
1-5	8.25	20.75

**Autoplas**  
**PTI Application: 02-12652**  
**Issue:**

**Facility ID: 0339010151**

**Emissions Unit ID: R008**

1-12	9.90	24.90
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- 2.c** The hourly and annual emission limitations from coating operations represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitations.
- 2.d** This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.e** The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Huron County, which is identified as a P- county.

## **B. Operational Restrictions**

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.
2. The use of cleanup material containing volatile organic compounds, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.
3. The use of cleanup material containing hazardous air pollutants, as defined in OAC rule 3745-31-01, in this emissions unit is prohibited.

## **C. Monitoring and/or Record keeping Requirements**

1. The permittee shall collect and record the following information each day for coating material usage in emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
  - a. the company name and identification for each coating employed;
  - b. documentation of whether or not each coating employed is a photochemically reactive material as defined in OAC rule 3745-21-01;
  - c. the OC content of each coating, as applied, in lbs/gallon;

- d. the number of gallons of each coating employed;
  - e. the OC emission rate for each coating, (c.) x (d.);
  - f. the total OC emission rate for all coatings, summation of (e.); and
  - g. the rolling 365-day summation of the total OC emission rate, in tons.
2. The permittee shall collect and record the following each month for cleanup material usage in emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
- a. the company name and identification for each cleanup material employed;
  - b. documentation of whether or not each cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-01;
  - c. documentation of whether or not each cleanup material employed is a volatile organic compound as defined in OAC rule 3745-21-01;
  - d. documentation of whether or not each cleanup material employed is a HAP as defined in OAC rule 3745-31-01;
  - e. the OC content of each cleanup material employed, in lbs/gallon;
  - f. the number of gallons of each cleanup material employed;
  - g. the OC emission rate for each cleanup material, (c.) x (d.);
  - h. the total OC emission rate for all cleanup materials, summation of (e.) in tons per month; and
  - i. the annual, year to date OC emissions from all cleanup materials employed (sum of (h.) for each calendar month to date from January to December).

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used

x solvent density of cleanup material) - (total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material]) x solvent density.

3. The permittee shall collect and record the following information regarding HAP emissions each month for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
  - a. the company identification of each coating employed;
  - b. the lbs/gallon of each individual HAP in each coating, as applied;
  - c. the number of gallons of each coating employed per month;
  - d. the emission rate for each individual HAP from each coating employed, (b.) x (c.);
  - e. the total emission rate for each individual HAP from all coatings employed, summation of (d.), in tons/month;
  - f. the total HAP emission rate for the combination of all HAPs from all coatings employed, summation of (e.) for all HAPs, in tons/month;
  - g. for the first 12 months of operation, under the provisions of this permit the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month; and
  - h. after the first 12 months of operation, under the provisions of this permit, the annual emissions of each individual HAP and the combination of all HAPs, based upon a rolling 12-month summation of the monthly emission rates.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

4. The permit to install for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission

**Autoplas****PTI Application: 02 12652****Issue****Facility ID: 0339010151****Emissions Unit ID: R008**

units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: methyl ethyl ketone

TLV (mg/m<sup>3</sup>): 589.78

Maximum Hourly Emission Rate (lbs/hr): 12.74

Predicted 1-Hour Maximum Ground-Level Concentration (mg/m<sup>3</sup>): 0.31

MAGLC (ug/m<sup>3</sup>): 14.05

Pollutant: 2-butoxyethanol  
TLV (mg/m<sup>3</sup>): 96.66  
Maximum Hourly Emission Rate (lbs/hr): 6.30  
Predicted 1-Hour Maximum Ground-Level Concentration (mg/m<sup>3</sup>): 0.14  
MAGLC (mg/m<sup>3</sup>): 2.31

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
5. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it

conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined, which identify exceedances of any of the following:
  - a. Any exceedances of the 90.0 tons OC per rolling 365-day period.
  - b. Any exceedances of the 9.9 tons of any single HAP per rolling, 12-month period.
  - c. Any exceedances of the 24.9 tons total combined HAP emissions per rolling, 12-month period.
  - d. Any exceedances of the cumulative single HAP emissions as identified in A.2.b for the first 12-months of operation under the provisions of this permit.
  - e. Any exceedances of the cumulative total combined HAP emissions as identified in A.2.b for the first 12-months of operation under the provisions of this permit.
  - f. Any exceedances of the 1,107 lbs NVOC/month from cleanup operations.

The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.

2. The permittee shall notify the Director (Northwest District Office) in writing of any record showing the following:
  - a. the use of photochemically reactive materials, as defined in OAC rule

3745-21-01, in this emissions unit.

- b. the use of cleanup material containing volatile organic compounds, as defined in OAC rule 3745-21-01, in this emissions unit.
- c. the use of cleanup material containing hazardous air pollutants, as defined in OAC rule 3745-31-01, in this emissions unit.

The notification shall include a copy of such record and shall be sent to the Director (Northwest District Office) within 30 days following the end of the calendar month.

#### **E. Testing Requirements**

1. Compliance with the emission limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation  
1.32 lbs OC/hour, 5.78 tons OC/yr

##### Applicable Compliance Method

The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (0.227 gallons per hour) by the maximum OC content of all the coatings (5.80 pounds per gallon).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

The annual allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly emissions of 1.32 lbs by a maximum operating schedule of 8760 hrs/yr divided by 2000 lbs/ton.

- b. Emission Limitation  
90.0 tons OC per rolling, 365-day period from all the emission units identified in A.2.b

##### Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in

section C.1.

- c. Emission Limitation  
9.9 tons of any single HAP emission per rolling, 12-month period from all the emission units identified in A.2.b

Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in section C.3.

- d. Emission Limitation  
24.9 tons of total combined HAP emissions per rolling, 12-month period from all the emission units identified in A.2.b

Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in section C.3.

e. Emission Limitation

1,107 lbs NVOC/month, 6.64 tons NVOC/yr from cleanup operations for R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined

Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in section C.2.

**F. Miscellaneous Requirements**

1. The issuance of this permit shall supercede all terms and conditions of PTI #03-7011 issued on 2-24-1993 and PTI #03-8830 issued on 8-30-1995 and modified on 8-27-1997.

**Autoplas**  
**PTI Application: 03-12652**  
**Issue**

**Facility ID: 0339010151**

**Emissions Unit ID: R009**

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

- The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
R009 - Paint Spray Booth #9 in Paint Line #5 (modification to PTI #03-7011 issued on 2-24-93 and PTI #03-8830 issued on 8-30-95 and modified on 8-27-97). Modification is to revise emission limitations	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-07(G)(2)
		OAC rule 3745-17-07(A)
		OAC rule 3745-17-11(B)
	OAC rule 3745-31-05(C)	

Applicable Emissions  
Limitations/Control Measures

1.32 lbs OC/hr, 5.78 tons OC/yr  
from coating operation

1,107 lbs NVOC/month, 6.64  
tons NVOC/yr from cleanup  
operations for R001, R002,  
R003, R004, R005, R006,  
R007, R008, R009, R010,  
R011, R012, and R013  
combined (see B.1., B.2., and  
B.3.)

See A.2.a

90.0 tons OC per rolling,  
365-day period from all the  
emission units identified in  
A.2.b

9.9 tons of any HAP emission  
per rolling, 12-month period  
from all the emission units  
identified in A.2.b

24.9 tons of total combined  
HAP emissions per rolling,  
12-month period from all the  
emission units identified in  
A.2.b

See B.1

See A.2.d

See A.2.e

## **2. Additional Terms and Conditions**

- 2.a** The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
- 2.b** This permit establishes the following federally enforceable emission limitations for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
- i. 90.00 tons OC per rolling, 12-month period
  - ii. 9.9 tons of any single HAP per rolling, 12-month period
  - iii. 24.9 tons of total combined HAP emissions per rolling, 12-month period

The federally enforceable emission limitations are being established for purposes of avoiding Title V and Maximum Achievable Control Technology (MACT) requirements. For purposes of federal enforceability an restriction on OC effectively restricts volatile organic compounds.

Rolling OC limitations for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 were established in Permit to Install (PTI) #03-PTI #03-8830 issued on 8-30-95 and modified on 8-27-97, and as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable OC restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability, OC limitations effectively restrict VOC emissions.

To ensure federal enforceability of single HAP and total HAP emission restrictions during the first 12 months of operation (following issuance of this permit) for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined, the permittee shall not exceed the cumulative monthly emissions specified in the following table:

Month	Any single HAP emission, in tons	Total HAP emissions, in tons
1	1.65	4.15
1-2	3.30	9.30
1-3	4.95	12.45
1-4	6.60	16.60
1-5	8.25	20.75

1-12	9.90	24.90
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- 2.c** The hourly and annual emission limitations from coating operations represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitations.
- 2.d** This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.e** The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Huron County, which is identified as a P- county.

## **B. Operational Restrictions**

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.
2. The use of cleanup material containing volatile organic compounds, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.
3. The use of cleanup material containing hazardous air pollutants, as defined in OAC rule 3745-31-01, in this emissions unit is prohibited.

## **C. Monitoring and/or Record keeping Requirements**

1. The permittee shall collect and record the following information each day for coating material usage in emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
  - a. the company name and identification for each coating employed;
  - b. documentation of whether or not each coating employed is a photochemically reactive material as defined in OAC rule 3745-21-01;
  - c. the OC content of each coating, as applied, in lbs/gallon;

- d. the number of gallons of each coating employed;
  - e. the OC emission rate for each coating, (c.) x (d.);
  - f. the total OC emission rate for all coatings, summation of (e.); and
  - g. the rolling 365-day summation of the total OC emission rate, in tons.
2. The permittee shall collect and record the following each month for cleanup material usage in emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
- a. the company name and identification for each cleanup material employed;
  - b. documentation of whether or not each cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-01;
  - c. documentation of whether or not each cleanup material employed is a volatile organic compound as defined in OAC rule 3745-21-01;
  - d. documentation of whether or not each cleanup material employed is a HAP as defined in OAC rule 3745-31-01;
  - e. the OC content of each cleanup material employed, in lbs/gallon;
  - f. the number of gallons of each cleanup material employed;
  - g. the OC emission rate for each cleanup material, (c.) x (d.);
  - h. the total OC emission rate for all cleanup materials, summation of (e.) in tons per month; and
  - i. the annual, year to date OC emissions from all cleanup materials employed (sum of (h.) for each calendar month to date from January to December).

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used

x solvent density of cleanup material) - (total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material]) x solvent density.

3. The permittee shall collect and record the following information regarding HAP emissions each month for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
  - a. the company identification of each coating employed;
  - b. the lbs/gallon of each individual HAP in each coating, as applied;
  - c. the number of gallons of each coating employed per month;
  - d. the emission rate for each individual HAP from each coating employed, (b.) x (c.);
  - e. the total emission rate for each individual HAP from all coatings employed, summation of (d.), in tons/month;
  - f. the total HAP emission rate for the combination of all HAPs from all coatings employed, summation of (e.) for all HAPs, in tons/month;
  - g. for the first 12 months of operation, under the provisions of this permit the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month; and
  - h. after the first 12 months of operation, under the provisions of this permit, the annual emissions of each individual HAP and the combination of all HAPs, based upon a rolling 12-month summation of the monthly emission rates.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

4. The permit to install for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission

**Autoplas****PTI Application: 02 12652****Issue****Facility ID: 0339010151****Emissions Unit ID: R009**

units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: methyl ethyl ketone

TLV (mg/m<sup>3</sup>): 589.78

Maximum Hourly Emission Rate (lbs/hr): 12.74

Predicted 1-Hour Maximum Ground-Level Concentration (mg/m<sup>3</sup>): 0.31

MAGLC (ug/m<sup>3</sup>): 14.05

Pollutant: 2-butoxyethanol  
TLV (mg/m<sup>3</sup>): 96.66  
Maximum Hourly Emission Rate (lbs/hr): 6.30  
Predicted 1-Hour Maximum Ground-Level Concentration (mg/m<sup>3</sup>): 0.14  
MAGLC (mg/m<sup>3</sup>): 2.31

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
5. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it

conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined, which identify exceedances of any of the following:
  - a. Any exceedances of the 90.0 tons OC per rolling 365-day period.
  - b. Any exceedances of the 9.9 tons of any single HAP per rolling, 12-month period.
  - c. Any exceedances of the 24.9 tons total combined HAP emissions per rolling, 12-month period.
  - d. Any exceedances of the cumulative single HAP emissions as identified in A.2.b for the first 12-months of operation under the provisions of this permit.
  - e. Any exceedances of the cumulative total combined HAP emissions as identified in A.2.b for the first 12-months of operation under the provisions of this permit.
  - f. Any exceedances of the 1,107 lbs NVOC/month from cleanup operations.

The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.

2. The permittee shall notify the Director (Northwest District Office) in writing of any record showing the following:
  - a. the use of photochemically reactive materials, as defined in OAC rule

3745-21-01, in this emissions unit.

- b. the use of cleanup material containing volatile organic compounds, as defined in OAC rule 3745-21-01, in this emissions unit.
- c. the use of cleanup material containing hazardous air pollutants, as defined in OAC rule 3745-31-01, in this emissions unit.

The notification shall include a copy of such record and shall be sent to the Director (Northwest District Office) within 30 days following the end of the calendar month.

## E. Testing Requirements

1. Compliance with the emission limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation  
1.32 lbs OC/hour, 5.78 tons OC/yr

### Applicable Compliance Method

The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (0.227 gallons per hour) by the maximum OC content of all the coatings (5.80 pounds per gallon).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

The annual allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly emissions of 1.32 lbs by a maximum operating schedule of 8760 hrs/yr divided by 2000 lbs/ton.

- b. Emission Limitation  
90.0 tons OC per rolling, 365-day period from all the emission units identified in A.2.b

### Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in section C.1.

- c. Emission Limitation  
9.9 tons of any single HAP emission per rolling, 12-month period from all the emission units identified in A.2.b
- Applicable Compliance Method  
Compliance shall be demonstrated by the monitoring and record keeping in section C.3.
- d. Emission Limitation  
24.9 tons of total combined HAP emissions per rolling, 12-month period from all the emission units identified in A.2.b
- Applicable Compliance Method  
Compliance shall be demonstrated by the monitoring and record keeping in section C.3.
- e. Emission Limitation  
1,107 lbs NVOC/month, 6.64 tons NVOC/yr from cleanup operations for R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined
- Applicable Compliance Method  
Compliance shall be demonstrated by the monitoring and record keeping in section C.2.

## **F. Miscellaneous Requirements**

1. The issuance of this permit shall supercede all terms and conditions of PTI #03-7011 issued on 2-24-1993 and PTI #03-8830 issued on 8-30-1995 and modified on 8-27-1997.

**Autoplas**  
**PTI Application: 03-12652**  
**Issue**

**Facility ID: 0339010151**

Emissions Unit ID: **R010**

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

- The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
R010 - Paint Spray Booth #10 in Paint Line #5 (modification to PTI #03-7011 issued on 2-24-93 and PTI #03-8830 issued on 8-30-95 and modified on 8-27-97). Modification is to revise emission limitations	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-07(G)(2)
		OAC rule 3745-17-07(A)
		OAC rule 3745-17-11(B)
	OAC rule 3745-31-05(C)	

**Autoplas****PTI Application: 02-12652****Issue****Facility ID: 0339010151****Emissions Unit ID: R010**

Applicable Emissions  
Limitations/Control Measures

1.32 lbs OC/hr, 5.78 tons OC/yr  
from coating operation

1,107 lbs NVOC/month, 6.64  
tons NVOC/yr from cleanup  
operations for R001, R002,  
R003, R004, R005, R006,  
R007, R008, R009, R010,  
R011, R012, and R013  
combined (see B.1., B.2., and  
B.3.)

See A.2.a

90.0 tons OC per rolling,  
365-day period from all the  
emission units identified in  
A.2.b

9.9 tons of any single HAP  
emission per rolling, 12-month  
period from all the emission  
units identified in A.2.b

24.9 tons of total combined  
HAP emissions per rolling,  
12-month period from all the  
emission units identified in  
A.2.b

See B.1

See A.2.d

See A.2.e

## **2. Additional Terms and Conditions**

- 2.a** The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
- 2.b** This permit establishes the following federally enforceable emission limitations for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
- i. 90.00 tons OC per rolling, 12-month period
  - ii. 9.9 tons of any single HAP per rolling, 12-month period
  - iii. 24.9 tons of total combined HAP emissions per rolling, 12-month period

The federally enforceable emission limitations are being established for purposes of avoiding Title V and Maximum Achievable Control Technology (MACT) requirements. For purposes of federal enforceability an restriction on OC effectively restricts volatile organic compounds.

Rolling OC limitations for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 were established in Permit to Install (PTI) #03-PTI #03-8830 issued on 8-30-95 and modified on 8-27-97, and as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable OC restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability, OC limitations effectively restrict VOC emissions.

To ensure federal enforceability of single HAP and total HAP emission restrictions during the first 12 months of operation (following issuance of this permit) for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined, the permittee shall not exceed the cumulative monthly emissions specified in the following table:

Month	Any single HAP emission, in tons	Total HAP emissions, in tons
1	1.65	4.15
1-2	3.30	9.30
1-3	4.95	12.45
1-4	6.60	16.60
1-5	8.25	20.75
1-12	9.90	24.90

- 2.c** The hourly and annual emission limitations from coating operations represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitations.
- 2.d** This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.e** The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Huron County, which is identified as a P- county.

## **B. Operational Restrictions**

- 1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.
- 2. The use of cleanup material containing volatile organic compounds, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.
- 3. The use of cleanup material containing hazardous air pollutants, as defined in OAC rule 3745-31-01, in this emissions unit is prohibited.

## **C. Monitoring and/or Record keeping Requirements**

- 1. The permittee shall collect and record the following information each day for coating material usage in emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
  - a. the company name and identification for each coating employed;
  - b. documentation of whether or not each coating employed is a photochemically reactive material as defined in OAC rule 3745-21-01;
  - c. the OC content of each coating, as applied, in lbs/gallon;

- d. the number of gallons of each coating employed;
  - e. the OC emission rate for each coating, (c.) x (d.);
  - f. the total OC emission rate for all coatings, summation of (e.); and
  - g. the rolling 365-day summation of the total OC emission rate, in tons.
2. The permittee shall collect and record the following each month for cleanup material usage in emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
- a. the company name and identification for each cleanup material employed;
  - b. documentation of whether or not each cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-01;
  - c. documentation of whether or not each cleanup material employed is a volatile organic compound as defined in OAC rule 3745-21-01;
  - d. documentation of whether or not each cleanup material employed is a HAP as defined in OAC rule 3745-31-01;
  - e. the OC content of each cleanup material employed, in lbs/gallon;
  - f. the number of gallons of each cleanup material employed;
  - g. the OC emission rate for each cleanup material, (c.) x (d.);
  - h. the total OC emission rate for all cleanup materials, summation of (e.) in tons per month; and
  - i. the annual, year to date OC emissions from all cleanup materials employed (sum of (h.) for each calendar month to date from January to December).

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent

off-site for disposal or reclamation [minus solids content of said material] x solvent density.

3. The permittee shall collect and record the following information regarding HAP emissions each month for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
  - a. the company identification of each coating employed;
  - b. the lbs/gallon of each individual HAP in each coating, as applied;
  - c. the number of gallons of each coating employed per month;
  - d. the emission rate for each individual HAP from each coating employed, (b.) x (c.);
  - e. the total emission rate for each individual HAP from all coatings employed, summation of (d.), in tons/month;
  - f. the total HAP emission rate for the combination of all HAPs from all coatings employed, summation of (e.) for all HAPs, in tons/month;
  - g. for the first 12 months of operation, under the provisions of this permit the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month; and
  - h. after the first 12 months of operation, under the provisions of this permit, the annual emissions of each individual HAP and the combination of all HAPs, based upon a rolling 12-month summation of the monthly emission rates.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

4. The permit to install for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission units using data from the permit to install application and the SCREEN 3.0 model (or

other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: methyl ethyl ketone

TLV (mg/m<sup>3</sup>): 589.78

Maximum Hourly Emission Rate (lbs/hr): 12.74

Predicted 1-Hour Maximum Ground-Level Concentration (mg/m<sup>3</sup>): 0.31

MAGLC (ug/m<sup>3</sup>): 14.05

**Autoplas****PTI Application: 03 12652****Issue****Facility ID: 0339010151****Emissions Unit ID: R010**

Pollutant: 2-butoxyethanol

TLV (mg/m3): 96.66

Maximum Hourly Emission Rate (lbs/hr): 6.30

Predicted 1-Hour Maximum Ground-Level Concentration (mg/m3): 0.14

MAGLC (mg/m3): 2.31

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
5. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluation to determine that the changed emissions unit will still satisfy the

"Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined, which identify exceedances of any of the following:
  - a. Any exceedances of the 90.0 tons OC per rolling 365-day period.
  - b. Any exceedances of the 9.9 tons of any single HAP per rolling, 12-month period.
  - c. Any exceedances of the 24.9 tons total combined HAP emissions per rolling, 12-month period.
  - d. Any exceedances of the cumulative single HAP emissions as identified in A.2.b for the first 12-months of operation under the provisions of this permit.
  - e. Any exceedances of the cumulative total combined HAP emissions as identified in A.2.b for the first 12-months of operation under the provisions of this permit.
  - f. Any exceedances of the 1,107 lbs NVOC/month from cleanup operations.

The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.

2. The permittee shall notify the Director (Northwest District Office) in writing of any record showing the following:
  - a. the use of photochemically reactive materials, as defined in OAC rule

3745-21-01, in this emissions unit.

- b. the use of cleanup material containing volatile organic compounds, as defined in OAC rule 3745-21-01, in this emissions unit.
- c. the use of cleanup material containing hazardous air pollutants, as defined in OAC rule 3745-31-01, in this emissions unit.

The notification shall include a copy of such record and shall be sent to the Director (Northwest District Office) within 30 days following the end of the calendar month.

## E. Testing Requirements

1. Compliance with the emission limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation  
 1.32 lbs OC/hour, 5.78 tons OC/yr

### Applicable Compliance Method

The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (0.227 gallons per hour) by the maximum OC content of all the coatings (5.80 pounds per gallon).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

The annual allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly emissions of 1.32 lbs by a maximum operating schedule of 8760 hrs/yr divided by 2000 lbs/ton.

- b. Emission Limitation  
 90.0 tons OC per rolling, 365-day period from all the emission units identified in A.2.b

### Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in section C.1.

- c. Emission Limitation  
9.9 tons of any single HAP emission per rolling, 12-month period from all the emission units identified in A.2.b  
  
Applicable Compliance Method  
Compliance shall be demonstrated by the monitoring and record keeping in section C.3.
  
- d. Emission Limitation  
24.9 tons of total combined HAP emissions per rolling, 12-month period from all the emission units identified in A.2.b

Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in section C.3.

e. Emission Limitation

1,107 lbs NVOC/month, 6.64 tons NVOC/yr from cleanup operations for R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined

Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in section C.2.

**F. Miscellaneous Requirements**

1. The issuance of this permit shall supercede all terms and conditions of PTI #03-7011 issued on 2-24-1993 and PTI #03-8830 issued on 8-30-1995 and modified on 8-27-1997.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
R011 - Paint Spray Booth #11 in Paint Line #6 (modification to PTI #03-7011 issued on 2-24-93 and PTI #03-8830 issued on 8-30-95 and modified on 8-27-97). Modification is to revise emission limitations	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-07(G)(2) OAC rule 3745-17-07(A)
	OAC rule 3745-31-05(C)	OAC rule 3745-17-11(B)

Applicable Emissions  
Limitations/Control Measures

1.32 lbs OC/hr, 5.78 tons OC/yr  
from coating operation

1,107 lbs NVOC/month, 6.64  
tons NVOC/yr from cleanup  
operations for R001, R002,  
R003, R004, R005, R006,  
R007, R008, R009, R010,  
R011, R012, and R013  
combined (see B.1., B.2., and  
B.3.)

See A.2.a

90.0 tons OC per rolling,  
365-day period from all the  
emission units identified in  
A.2.b

9.9 tons of any single HAP  
emission per rolling, 12-month  
period from all the emission  
units identified in A.2.b

24.9 tons of total combined  
HAP emissions per rolling,  
12-month period from all the  
emission units identified in  
A.2.b

See B.1

See A.2.d

See A.2.e

## 2. Additional Terms and Conditions

- 2.a** The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
- 2.b** This permit establishes the following federally enforceable emission limitations for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
- i. 90.00 tons OC per rolling, 12-month period
  - ii. 9.9 tons of any single HAP per rolling, 12-month period
  - iii. 24.9 tons of total combined HAP emissions per rolling, 12-month period

The federally enforceable emission limitations are being established for purposes of avoiding Title V and Maximum Achievable Control Technology (MACT) requirements. For purposes of federal enforceability an restriction on OC effectively restricts volatile organic compounds.

Rolling OC limitations for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 were established in Permit to Install (PTI) #03-PTI #03-8830 issued on 8-30-95 and modified on 8-27-97, and as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable OC restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability, OC limitations effectively restrict VOC emissions.

To ensure federal enforceability of single HAP and total HAP emission restrictions during the first 12 months of operation (following issuance of this permit) for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined, the permittee shall not exceed the cumulative monthly emissions specified in the following table:

Month	Any single HAP emission, in tons	Total HAP emissions, in tons
1	1.65	4.15
1-2	3.30	9.30
1-3	4.95	12.45
1-4	6.60	16.60
1-5	8.25	20.75
1-12	9.90	24.90

- 2.c** The hourly and annual emission limitations from coating operations represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitations.
- 2.d** This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.e** The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Huron County, which is identified as a P- county.

## **B. Operational Restrictions**

- 1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.
- 2. The use of cleanup material containing volatile organic compounds, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.
- 3. The use of cleanup material containing hazardous air pollutants, as defined in OAC rule 3745-31-01, in this emissions unit is prohibited.

## **C. Monitoring and/or Record keeping Requirements**

- 1. The permittee shall collect and record the following information each day for coating material usage in emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
  - a. the company name and identification for each coating employed;
  - b. documentation of whether or not each coating employed is a photochemically reactive material as defined in OAC rule 3745-21-01;
  - c. the OC content of each coating, as applied, in lbs/gallon;

- d. the number of gallons of each coating employed;
  - e. the OC emission rate for each coating, (c.) x (d.);
  - f. the total OC emission rate for all coatings, summation of (e.); and
  - g. the rolling 365-day summation of the total OC emission rate, in tons.
2. The permittee shall collect and record the following each month for cleanup material usage in emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
- a. the company name and identification for each cleanup material employed;
  - b. documentation of whether or not each cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-01;
  - c. documentation of whether or not each cleanup material employed is a volatile organic compound as defined in OAC rule 3745-21-01;
  - d. documentation of whether or not each cleanup material employed is a HAP as defined in OAC rule 3745-31-01;
  - e. the OC content of each cleanup material employed, in lbs/gallon;
  - f. the number of gallons of each cleanup material employed;
  - g. the OC emission rate for each cleanup material, (c.) x (d.);
  - h. the total OC emission rate for all cleanup materials, summation of (e.) in tons per month; and
  - i. the annual, year to date OC emissions from all cleanup materials employed (sum of (h.) for each calendar month to date from January to December).

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used

x solvent density of cleanup material) - (total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material]) x solvent density.

3. The permittee shall collect and record the following information regarding HAP emissions each month for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
  - a. the company identification of each coating employed;
  - b. the lbs/gallon of each individual HAP in each coating, as applied;
  - c. the number of gallons of each coating employed per month;
  - d. the emission rate for each individual HAP from each coating employed, (b.) x (c.);
  - e. the total emission rate for each individual HAP from all coatings employed, summation of (d.), in tons/month;
  - f. the total HAP emission rate for the combination of all HAPs from all coatings employed, summation of (e.) for all HAPs, in tons/month;
  - g. for the first 12 months of operation, under the provisions of this permit the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month; and
  - h. after the first 12 months of operation, under the provisions of this permit, the annual emissions of each individual HAP and the combination of all HAPs, based upon a rolling 12-month summation of the monthly emission rates.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

4. The permit to install for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission units using data from the permit to install application and the SCREEN 3.0 model (or

other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: methyl ethyl ketone

TLV (mg/m<sup>3</sup>): 589.78

Maximum Hourly Emission Rate (lbs/hr): 12.74

Predicted 1-Hour Maximum Ground-Level Concentration (mg/m<sup>3</sup>): 0.31

MAGLC (ug/m<sup>3</sup>): 14.05

Pollutant: 2-butoxyethanol  
TLV (mg/m<sup>3</sup>): 96.66  
Maximum Hourly Emission Rate (lbs/hr): 6.30  
Predicted 1-Hour Maximum Ground-Level Concentration (mg/m<sup>3</sup>): 0.14  
MAGLC (mg/m<sup>3</sup>): 2.31

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
5. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it

conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined, which identify exceedances of any of the following:
  - a. Any exceedances of the 90.0 tons OC per rolling 365-day period.
  - b. Any exceedances of the 9.9 tons of any single HAP per rolling, 12-month period.
  - c. Any exceedances of the 24.9 tons total combined HAP emissions per rolling, 12-month period.
  - d. Any exceedances of the cumulative single HAP emissions as identified in A.2.b for the first 12-months of operation under the provisions of this permit.
  - e. Any exceedances of the cumulative total combined HAP emissions as identified in A.2.b for the first 12-months of operation under the provisions of this permit.
  - f. Any exceedances of the 1,107 lbs NVOC/month from cleanup operations.

The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.

2. The permittee shall notify the Director (Northwest District Office) in writing of any record showing the following:
  - a. the use of photochemically reactive materials, as defined in OAC rule

3745-21-01, in this emissions unit.

- b. the use of cleanup material containing volatile organic compounds, as defined in OAC rule 3745-21-01, in this emissions unit.
- c. the use of cleanup material containing hazardous air pollutants, as defined in OAC rule 3745-31-01, in this emissions unit.

The notification shall include a copy of such record and shall be sent to the Director (Northwest District Office) within 30 days following the end of the calendar month.

#### **E. Testing Requirements**

- 1. Compliance with the emission limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation  
1.32 lbs OC/hour, 5.78 tons OC/yr

##### Applicable Compliance Method

The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (0.227 gallons per hour) by the maximum OC content of all the coatings (5.80 pounds per gallon).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

The annual allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly emissions of 1.32 lbs by a maximum operating schedule of 8760 hrs/yr divided by 2000 lbs/ton.

- b. Emission Limitation  
90.0 tons OC per rolling, 365-day period from all the emission units identified in A.2.b

##### Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in

**Autoplas****PTI Application: 02-12652****Issue****Facility ID: 0339010151****Emissions Unit ID: R011**

section C.1.

c. Emission Limitation

9.9 tons of any single HAP emission per rolling, 12-month period from all the emission units identified in A.2.b

Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in section C.3.

d. Emission Limitation

24.9 tons of total combined HAP emissions per rolling, 12-month period from all the emission units identified in A.2.b

**Autox  
PTI A  
Issued: 4/3/2007**

Emissions Unit ID: **R011**

Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in section C.3.

e. Emission Limitation

1,107 lbs NVOC/month, 6.64 tons NVOC/yr from cleanup operations for R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined

Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in section C.2.

**F. Miscellaneous Requirements**

1. The issuance of this permit shall supercede all terms and conditions of PTI #03-7011 issued on 2-24-1993 and PTI #03-8830 issued on 8-30-1995 and modified on 8-27-1997.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
R012 - Paint Spray Booth #12 in Paint Line #6 (modification to PTI #03-7011 issued on 2-24-93 and PTI #03-8830 issued on 8-30-95 and modified on 8-27-97). Modification is to revise emission limitations	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-07(G)(2) OAC rule 3745-17-07(A)
	OAC rule 3745-31-05(C)	OAC rule 3745-17-11(B)

Applicable Emissions  
Limitations/Control Measures

1.32 lbs OC/hr, 5.78 tons OC/yr  
from coating operation

1,107 lbs NVOC/month, 6.64  
tons NVOC/yr from cleanup  
operations for R001, R002,  
R003, R004, R005, R006,  
R007, R008, R009, R010,  
R011, R012, and R013  
combined (see B.1., B.2., and  
B.3.)

See A.2.a

90.0 tons OC per rolling,  
365-day period from all the  
emission units identified in  
A.2.b

9.9 tons of any single HAP  
emission per rolling, 12-month  
period from all the emission  
units identified in A.2.b

24.9 tons of total combined  
HAP emissions per rolling,  
12-month period from all the  
emission units identified in  
A.2.b

See B.1

See A.2.d

See A.2.e

## 2. Additional Terms and Conditions

- 2.a** The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
- 2.b** This permit establishes the following federally enforceable emission limitations for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
- i. 90.00 tons OC per rolling, 12-month period
  - ii. 9.9 tons of any single HAP per rolling, 12-month period
  - iii. 24.9 tons of total combined HAP emissions per rolling, 12-month period

The federally enforceable emission limitations are being established for purposes of avoiding Title V and Maximum Achievable Control Technology (MACT) requirements. For purposes of federal enforceability an restriction on OC effectively restricts volatile organic compounds.

Rolling OC limitations for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 were established in Permit to Install (PTI) #03-PTI #03-8830 issued on 8-30-95 and modified on 8-27-97, and as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable OC restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability, OC limitations effectively restrict VOC emissions.

To ensure federal enforceability of single HAP and total HAP emission restrictions during the first 12 months of operation (following issuance of this permit) for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined, the permittee shall not exceed the cumulative monthly emissions specified in the following table:

Month	Any single HAP emission, in tons	Total HAP emissions, in tons
1	1.65	4.15
1-2	3.30	9.30
1-3	4.95	12.45
1-4	6.60	16.60
1-5	8.25	20.75
1-12	9.90	24.90

- 2.c** The hourly and annual emission limitations from coating operations represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitations.
- 2.d** This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.e** The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Huron County, which is identified as a P- county.

## **B. Operational Restrictions**

- 1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.
- 2. The use of cleanup material containing volatile organic compounds, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.
- 3. The use of cleanup material containing hazardous air pollutants, as defined in OAC rule 3745-31-01, in this emissions unit is prohibited.

## **C. Monitoring and/or Record keeping Requirements**

- 1. The permittee shall collect and record the following information each day for coating material usage in emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
  - a. the company name and identification for each coating employed;
  - b. documentation of whether or not each coating employed is a photochemically reactive material as defined in OAC rule 3745-21-01;
  - c. the OC content of each coating, as applied, in lbs/gallon;

- d. the number of gallons of each coating employed;
  - e. the OC emission rate for each coating, (c.) x (d.);
  - f. the total OC emission rate for all coatings, summation of (e.); and
  - g. the rolling 365-day summation of the total OC emission rate, in tons.
2. The permittee shall collect and record the following each month for cleanup material usage in emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
- a. the company name and identification for each cleanup material employed;
  - b. documentation of whether or not each cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-01;
  - c. documentation of whether or not each cleanup material employed is a volatile organic compound as defined in OAC rule 3745-21-01;
  - d. documentation of whether or not each cleanup material employed is a HAP as defined in OAC rule 3745-31-01;
  - e. the OC content of each cleanup material employed, in lbs/gallon;
  - f. the number of gallons of each cleanup material employed;
  - g. the OC emission rate for each cleanup material, (c.) x (d.);
  - h. the total OC emission rate for all cleanup materials, summation of (e.) in tons per month; and
  - i. the annual, year to date OC emissions from all cleanup materials employed (sum of (h.) for each calendar month to date from January to December).

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used

x solvent density of cleanup material) - (total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material]) x solvent density.

3. The permittee shall collect and record the following information regarding HAP emissions each month for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
  - a. the company identification of each coating employed;
  - b. the lbs/gallon of each individual HAP in each coating, as applied;
  - c. the number of gallons of each coating employed per month;
  - d. the emission rate for each individual HAP from each coating employed, (b.) x (c.);
  - e. the total emission rate for each individual HAP from all coatings employed, summation of (d.), in tons/month;
  - f. the total HAP emission rate for the combination of all HAPs from all coatings employed, summation of (e.) for all HAPs, in tons/month;
  - g. for the first 12 months of operation, under the provisions of this permit the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month; and
  - h. after the first 12 months of operation, under the provisions of this permit, the annual emissions of each individual HAP and the combination of all HAPs, based upon a rolling 12-month summation of the monthly emission rates.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

4. The permit to install for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission units using data from the permit to install application and the SCREEN 3.0 model (or

other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: methyl ethyl ketone

TLV (mg/m<sup>3</sup>): 589.78

Maximum Hourly Emission Rate (lbs/hr): 12.74

Predicted 1-Hour Maximum Ground-Level Concentration (mg/m<sup>3</sup>): 0.31

MAGLC (ug/m<sup>3</sup>): 14.05

Pollutant: 2-butoxyethanol  
TLV (mg/m<sup>3</sup>): 96.66  
Maximum Hourly Emission Rate (lbs/hr): 6.30  
Predicted 1-Hour Maximum Ground-Level Concentration (mg/m<sup>3</sup>): 0.14  
MAGLC (mg/m<sup>3</sup>): 2.31

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
5. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it

conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined, which identify exceedances of any of the following:
  - a. Any exceedances of the 90.0 tons OC per rolling 365-day period.
  - b. Any exceedances of the 9.9 tons of any single HAP per rolling, 12-month period.
  - c. Any exceedances of the 24.9 tons total combined HAP emissions per rolling, 12-month period.
  - d. Any exceedances of the cumulative single HAP emissions as identified in A.2.b for the first 12-months of operation under the provisions of this permit.
  - e. Any exceedances of the cumulative total combined HAP emissions as identified in A.2.b for the first 12-months of operation under the provisions of this permit.
  - f. Any exceedances of the 1,107 lbs NVOC/month from cleanup operations.

The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.

2. The permittee shall notify the Director (Northwest District Office) in writing of any record showing the following:
  - a. the use of photochemically reactive materials, as defined in OAC rule

3745-21-01, in this emissions unit.

- b. the use of cleanup material containing volatile organic compounds, as defined in OAC rule 3745-21-01, in this emissions unit.
- c. the use of cleanup material containing hazardous air pollutants, as defined in OAC rule 3745-31-01, in this emissions unit.

The notification shall include a copy of such record and shall be sent to the Director (Northwest District Office) within 30 days following the end of the calendar month.

## **E. Testing Requirements**

1. Compliance with the emission limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation  
1.32 lbs OC/hour, 5.78 tons OC/yr

### Applicable Compliance Method

The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (0.227 gallons per hour) by the maximum OC content of all the coatings (5.80 pounds per gallon).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

The annual allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly emissions of 1.32 lbs by a maximum operating schedule of 8760 hrs/yr divided by 2000 lbs/ton.

- b. Emission Limitation  
90.0 tons OC per rolling, 365-day period from all the emission units identified in A.2.b

### Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in

**Autoplas****PTI Application: 02-12652****Issue****Facility ID: 0339010151****Emissions Unit ID: R012**

section C.1.

c. Emission Limitation

9.9 tons of any single HAP emission per rolling, 12-month period from all the emission units identified in A.2.b

Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in section C.3.

d. Emission Limitation

24.9 tons of total combined HAP emissions per rolling, 12-month period from all the emission units identified in A.2.b

Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in section C.3.

e. Emission Limitation

1,107 lbs NVOC/month, 6.64 tons NVOC/yr from cleanup operations for R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined

Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in section C.2.

**F. Miscellaneous Requirements**

1. The issuance of this permit shall supercede all terms and conditions of PTI #03-7011 issued on 2-24-1993 and PTI #03-8830 issued on 8-30-1995 and modified on 8-27-1997.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
R013 - Paint Line #7 which includes Paint Spray Booths #13 and #14 with curing oven (This PTI is a modification to PTI #03-8830 which was issued on 8-30-95 and modified on 8-27-97 and included 13 paint spray booths). This emissions unit is being modified to include the addition of Paint Booth #14 to Paint Line #7.	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-07(G)(1)
		OAC rule 3745-21-07(G)(2)
		OAC rule 3745-17-07(A)
		OAC rule 3745-17-11(B)
	OAC rule 3745-31-05(C)	

Applicable Emissions  
Limitations/Control Measures

See A.2.e

See A.2.f

2.64 lbs OC/hr, 11.56 tons  
OC/yr

1,107 lbs NVOC/month, 6.64  
tons NVOC/yr from cleanup  
operations for R001, R002,  
R003, R004, R005, R006,  
R007, R008, R009, R010,  
R011, R012, and R013  
combined (see B.1., B.2., and  
B.3.)

See A.2.a

90.0 tons OC per rolling,  
365-day period from all the  
emission units identified in  
A.2.b

9.9 tons of any single HAP  
emission per rolling, 12-month  
period from all the emission  
units identified in A.2.b

24.9 tons of total combined  
HAP emissions per rolling,  
12-month period from all the  
emission units identified in  
A.2.b

OC emissions from curing oven  
operations shall not exceed 15  
lbs per day (See A.2.c)

See B.1

## 2. Additional Terms and Conditions

- 2.a** The requirements of this rule includes compliance with the requirements of OAC rule 3745-31-05(C). The requirements of this rule also includes compliance with the requirements of OAC rule 3745-21-07(G)(1) that OC emissions from curing oven operations shall not exceed 15 pounds per day.
- 2.b** This permit establishes the following federally enforceable emission limitations for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
- i. 90.00 tons OC per rolling, 12-month period
  - ii. 9.9 tons of any single HAP per rolling, 12-month period
  - iii. 24.9 tons of total combined HAP emissions per rolling, 12-month period

The federally enforceable emission limitations are being established for purposes of avoiding Title V and Maximum Achievable Control Technology (MACT) requirements. For purposes of federal enforceability an restriction on OC effectively restrictions volatile organic compounds.

Rolling OC limitations for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 were established in Permit to Install (PTI) #03-8830 issued on 8-30-95 and modified on 8-27-97, and as such, rolling OC emission records exist. Therefore, it is not necessary to establish federally enforceable OC restrictions for the first 12 months of operation following the issuance of this permit. For purposes of federal enforceability, OC limitations effectively restrict VOC emissions.

To ensure federal enforceability of single HAP and total HAP emission restrictions during the first 12 months of operation (following issuance of this permit) for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined, the permittee shall not exceed the cumulative monthly emissions specified in the following table:

Month	Any single HAP emission, in tons	Total HAP emissions, in tons
1	1.65	4.15
1-2	3.30	9.30
1-3	4.95	12.45
1-4	6.60	16.60
1-5	8.25	20.75
1-12	9.90	24.90

- 2.c** The requirement of OAC rule 3745-21-07(G)(1) that OC emissions shall not exceed 3 pounds per hour from curing oven operations is less stringent than the emission limitation of 2.64 pounds OC per hour for the entire coating line established pursuant to OAC rule 3745-31-05(A)(3).
- 2.d** The hourly and annual emission limitations from coating operations represent the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitations.
- 2.e** This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.f** The uncontrolled mass rate of particulate emissions (PE) from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Huron County, which is identified as a P- county.

## **B. Operational Restrictions**

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.
2. The use of cleanup material containing volatile organic compounds, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.
3. The use of cleanup material containing hazardous air pollutants, as defined in OAC

rule 3745-31-01, in this emissions unit is prohibited.

### **C. Monitoring and/or Record keeping Requirements**

1. The permittee shall collect and record the following information each day for this emissions unit for purposes of demonstrating compliance with the 15 lbs OC/day emission limitation for the curing oven operations.

For purposes of calculating the OC emission rates from the curing oven, the permittee shall utilize the maximum percentage of the OC employed in the spray booths that are emitted uncontrolled from the booths. The remaining percentage value of the OC employed in the paint booths shall be considered to be the oven emissions from this emissions unit. In the absence of obtaining values from the results of emission testing, the permittee shall utilize a value of 80% as the maximum percentage of the OC employed in this emissions unit that are emitted uncontrolled from the booths. The remaining 20% of the OC employed in the spray booths shall be considered to be the oven emissions from this emissions unit.

- a. the company name and identification for each coating employed;
  - c. the OC content of each coating, as applied, in lbs/gallon;
  - d. the number of gallons of each coating employed;
  - e. the OC emission rate for each coating, (c.) x (d.);
  - f. the total OC emission rate for all coatings, summation of (e.); and
  - g. the total OC emission rate for the curing oven calculated by multiplying the maximum percentage of the OC emissions attributed to the oven (0.20 - as defined above) by the total OC emission rate for all coatings employed (value of C.1.f) resulting in pounds OC per day emitted from the oven.
2. The permittee shall collect and record the following information each day for coating material usage in emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
    - a. the company name and identification for each coating employed;
    - b. documentation of whether or not each coating employed is a photochemically

**Autoplas**  
**PTI Application: 02 12652**  
**Issue**

**Facility ID: 0339010151**

**Emissions Unit ID: R013**

reactive material as defined in OAC rule 3745-21-01;

- c. the OC content of each coating, as applied, in lbs/gallon;
- d. the number of gallons of each coating employed;

- e. the OC emission rate for each coating, (c.) x (d.);
  - f. the total OC emission rate for all coatings, summation of (e.); and
  - g. the rolling 365-day summation of the total OC emission rate, in tons.
3. The permittee shall collect and record the following each month for cleanup material usage in emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
- a. the company name and identification for each cleanup material employed;
  - b. documentation of whether or not each cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-01;
  - c. documentation of whether or not each cleanup material employed is a volatile organic compound as defined in OAC rule 3745-21-01;
  - d. documentation of whether or not each cleanup material employed is a HAP as defined in OAC rule 3745-31-01;
  - e. the OC content of each cleanup material employed, in lbs/gallon;
  - f. the number of gallons of each cleanup material employed;
  - g. the OC emission rate for each cleanup material, (c.) x (d.);
  - h. the total OC emission rate for all cleanup materials, summation of (e.) in tons per month; and
  - i. the annual, year to date OC emissions from all cleanup materials employed (sum of (h.) for each calendar month to date from January to December).

The company may calculate OC emissions from cleanup operations in accordance with the following formula if waste cleanup materials are sent off-site for reclamation/disposal:

OC emissions from cleanup operations = (total gallons of cleanup material used x solvent density of cleanup material) - (total gallons cleanup material sent off-site for disposal or reclamation [minus solids content of said material]) x

solvent density.

4. The permittee shall collect and record the following information regarding HAP emissions each month for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined:
  - a. the company identification of each coating employed;
  - b. the lbs/gallon of each individual HAP in each coating, as applied;
  - c. the number of gallons of each coating employed per month;
  - d. the emission rate for each individual HAP from each coating employed, (b.) x (c.);
  - e. the total emission rate for each individual HAP from all coatings employed, summation of (d.), in tons/month;
  - f. the total HAP emission rate for the combination of all HAPs from all coatings employed, summation of (e.) for all HAPs, in tons/month;
  - g. for the first 12 months of operation, under the provisions of this permit the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month; and
  - h. after the first 12 months of operation, under the provisions of this permit, the annual emissions of each individual HAP and the combination of all HAPs, based upon a rolling 12-month summation of the monthly emission rates.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

5. The permit to install for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emission units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level

**Autoplas****PTI Application: 02 12652****Issue****Facility ID: 0339010151****Emissions Unit ID: R013**

concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: methyl ethyl ketone

TLV (mg/m<sup>3</sup>): 589.78

Maximum Hourly Emission Rate (lbs/hr): 12.74

Predicted 1-Hour Maximum Ground-Level Concentration (mg/m<sup>3</sup>): 0.31

MAGLC (ug/m<sup>3</sup>): 14.05

Pollutant: 2-butoxyethanol  
TLV (mg/m<sup>3</sup>): 96.66  
Maximum Hourly Emission Rate (lbs/hr): 6.30  
Predicted 1-Hour Maximum Ground-Level Concentration (mg/m<sup>3</sup>): 0.14  
MAGLC (mg/m<sup>3</sup>): 2.31

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the compositions of the materials, or use of new materials that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
6. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it

conducts evaluation to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports for emission units R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined, which identify exceedances of any of the following:
  - a. Any exceedances of the 90.0 tons OC per rolling 365-day period.
  - b. Any exceedances of the 9.9 tons of any single HAP per rolling, 12-month period.
  - c. Any exceedances of the 24.9 tons total combined HAP emissions per rolling, 12-month period.
  - d. Any exceedances of the cumulative single HAP emissions as identified in A.2.b for the first 12-months of operation under the provisions of this permit.
  - e. Any exceedances of the cumulative total combined HAP emissions as identified in A.2.b for the first 12-months of operation under the provisions of this permit.
  - f. Any exceedances of the 1,107 lbs NVOC/month from cleanup operations
  - g. Any exceedances of the 15 lbs OC/day from curing oven operations

The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.

2. The permittee shall notify the Director (Northwest District Office) in writing of any record

showing the following:

- a. the use of photochemically reactive materials, as defined in OAC rule 3745-21-01, in this emissions unit.
- b. the use of cleanup material containing volatile organic compounds, as defined in OAC rule 3745-21-01, in this emissions unit.
- c. the use of cleanup material containing hazardous air pollutants, as defined in OAC rule 3745-31-01, in this emissions unit.

The notification shall include a copy of such record and shall be sent to the Director (Northwest District Office) within 30 days following the end of the calendar month.

## **E. Testing Requirements**

1. Compliance with the emission limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation  
2.64 lbs OC/hour, 11.56 tons OC/yr

### Applicable Compliance Method

The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (0.454 gallons per hour) by the maximum OC content of all the coatings (5.80 pounds per gallon).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

The annual allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly emissions of 2.64 lbs by a maximum operating schedule of 8760 hrs/yr divided by 2000 lbs/ton.

- b. Emission Limitation  
90.0 tons OC per rolling, 365-day period from all the emission units identified in A.2.b

### Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in section C.2.

- c. Emission Limitation  
9.9 tons of any single HAP emission per rolling, 12-month period from all the emission units identified in A.2.b

Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in section C.4.

- d. Emission Limitation  
24.9 tons of total combined HAP emissions per rolling, 12-month period from all the emission units identified in A.2.b

Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in section C.4.

- e. Emission Limitation  
1,107 lbs NVOC/month, 6.64 tons NVOC/yr from cleanup operations for R001, R002, R003, R004, R005, R006, R007, R008, R009, R010, R011, R012, and R013 combined

Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in section C.3.

- f. Emission Limitation  
15 lbs OC/day associated with the oven emissions in this emissions unit

Applicable Compliance Method

Compliance shall be demonstrated by the monitoring and record keeping in section C.1.

## **F. Miscellaneous Requirements**

1. The issuance of this permit shall supercede all terms and conditions of PTI #03-8830 issued on 8-30-1995 and modified on 8-27-1997.